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**POLICE FEDERATION OF AUSTRALIA: SUPPLEMENTARY SUBMISSION NO. 2**

**INQUIRY INTO EMERGENCY COMMUNICATIONS**

Based on the evidence provided to your Senate Committee hearing on 9 August 2011 by officials from DBCDE and ACMA, a number of matters regarding the 700 or 800 MHz spectrum issue are now somewhat clearer. Therefore, we take this opportunity to make a number of further points which will probably be useful for your Committee to be aware of.

In doing so, the Police Federation of Australia does not resile from its view, shared by Police Commissioners, that 20 MHz of spectrum in the 700 MHz band should be reserved by the Australian Government for police and emergency services to enable them to develop modern interoperable LTE mobile broadband communications.

**Availability of 800 MHz Spectrum for Public Safety Agencies**

It appears that ACMA is proposing an allocation of spectrum in the range 805-820 MHz paired with 850-865 MHz for public safety agencies (they say 820-825 and 865-870 MHz is for trunked land mobile services, not for public safety use).

We note that Telstra-Voda Next G occupies 825-845 and 870-890 MHz which is used for cellular mobile telephone services. We are advised that Telstra also wants the segment 814-824 (adjacent to its existing spectrum licence). If it was successful in achieving that, it would leave only 806-813 for public safety agencies, short of the 10 MHz they need. This goes to the point the PFA made that competing interests are vying for spectrum in the 800 MHz band, just as they are for 700 MHz spectrum.

We also understand that the ITU designated Public Protection and Disaster Relief frequency range for the Asia Pacific Region is for narrowband, not broadband purposes.

We are advised broadband operations in the 805-820 MHz band would cause interference with the 'digital dividend' band 2 MHz away. Moving public safety higher up the 800 MHz band to avoid this would mean over 10,000 users and over 400 links would need to be cleared, affecting tens of thousands of end users.

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Given all these problems and uncertainties we submit to the Committee that 20 MHz (10 MHz plus 10 MHz) of the 700 MHz spectrum should be reserved by the Minister for Australia's public safety agencies.

If the Committee is not prepared to make that recommendation, we propose that you recommend that the option of reserving 20 MHz of the 700 MHz spectrum be kept open until and unless the public safety agency representatives on the Public Safety Mobile Broadband Steering Committee, who are the ones that have to provide vital public safety services, are satisfied that spectrum in the 800 MHz band is a viable proposition for their mobile broadband communications.

As you know the Steering Committee is due to report to COAG in March 2012, prior to the auction of 700 MHz spectrum in the second half of 2012. The Steering Committee Terms of Reference should be widened to enable it to examine the 700 MHz option.

#### **Interoperability for Public Safety Broadband Communications**

It has become clear that the COAG commitment to interoperable communications applies only to the arrangements for public safety agencies in the 400 MHz band for voice communications. There appears to be no disagreement from Departments or ACMA, and certainly not from public safety agencies, that future mobile broadband communications should also be interoperable across Australia. A recommendation along these lines from the Committee would be most useful.

#### **Selective Reporting Regarding the Access Economics Report**

The Australian Mobile Telecommunications Society, in evidence to the Committee, cited the Access Economics commissioned by the Attorney-General's Department. The PFA regards the sections of the Access Economics report cited as highly selective.

The Access Economics report also said:

- 'A full cost benefit analysis is not conducted as identification of the benefits would require significant extra research beyond the scope of this project.' (page i)

*(Therefore the benefits, financial and otherwise, to the public in times of natural disasters and other emergencies have not been considered.)*

- 'Relying on commercial arrangements, however, does present some organisational difficulties such as reaching contractual agreements, managing the market power of the commercial operator and enforcing contract terms.' (page i)
- The report 'takes the benefits of allocating spectrum to PSAs as given'. (page 1)
- '.....the use of new technology has the potential to be as profound for PSAs in their operations as in the economy more broadly.' (page 5)
- '.....PSAs may need up to 20MHz of spectrum (divided into two lots of 10 MHz).' (page 10)
- 'To date, LTE equipment has been manufactured for the digital dividend range, as well as 2.5 GHz range and, to a lesser extent, the 1800 MHz range. Any other allocation would require investment in research and development to make LTE workable. The need to specially manufacture terminals would roughly double the cost of these compared to the conventional bands. If another candidate band were to become available, it would require a study to determine the suitability of this band for the PSAs' requirements in terms of cost and equipment and terminal vendor support.' (page 23)
- 'The digital dividend spectrum is the preferred option if a private (PSA) network is to be built.' (page 24)

*(Note that Access Economics considered 700 MHz, 1800 MHz and 2.5 GHz band options.)*

- 'The issues relating to market power arise from the fact that Telstra is currently the only operator in a position to provide an adequate solution for the PSAs' (if a commercial solution was followed) (page 26).

