POLICE FEDERATION OF AUSTRALIA SUBMISSION:

ENVIRONMENT AND COMMUNICATIONS REFERENCES COMMITTEE

INQUIRY INTO EMERGENCY COMMUNICATIONS

INTRODUCTION

1. The PFAs interest in this inquiry stems from the needs of Australia's 55,000 police officers for effective, modern systems of communications for their work 24 hours a day, 7 days a week and, most particularly, during and after emergencies and natural disasters when their work and that of other emergency services is vital to public safety and the protection of life and property.

2. We recently make a submission to your earlier inquiry into the Broadcasting Legislation Amendment (Digital Dividend and Other Measures) Bill 2011 which introduced amendments to the *Radiocommunications Act 1992* (and other Acts) to realize the Digital Dividend. Some of the material we canvassed in that submission is revisited in this submission.

3. We propose to focus in this submission on Term of Reference (e), namely:

   The capacity of communications networks and emergency warning systems to deal with emergencies and natural disasters, with particular reference to **new and emerging technologies including digital spectrum that could improve preparation for, responses to and recovery from, an emergency or natural disaster.**

CURRENT CAPACITIES

4. The recent experience during Australian natural disasters show up serious shortcomings in emergency warnings and communications systems. These include:

   - the Canberra bushfires of 2001;
   - the Victorian Black Saturday Bushfires of 2003;
   - the Brisbane and Queensland Floods of the summer of 2010 and 2011; and
   - Queensland's Cyclone Yasi in 2011.

5. Formal inquiries into the first two of these natural disasters identified many failures in communications systems and warning systems so vital to public safety. The reports and findings of those inquiries would be available to the Committee so we will not repeat them here. In addition, it would be useful for the Committee to have at least interim reports from reviews of the 2010-2011 Queensland natural disasters for the most up-to-date information on communications failures and deficiencies and inadequacy of warning systems.

   We do know that fire fighters and police were left in an information vacuum during

the Victorian Black Saturday bushfires. Many systems failed. During the Queensland floods tens of thousands of people were without mobile, landline of internet access, including 62,000 Telstra customers, 262 exchange areas were out of service, 25 mobile towers were inoperable, and the nation's telecommunications companies faced a repair bill in excess of $50 million and three months of build time to repair communications systems[1]. During Cyclone Yasi telecommunications systems collapsed over a wide area of north Queensland, 450 network sites and 10,000 landline phones were offline[2]. Thousands of people were without fixed or mobile communications for weeks. The 000 services in South East and North Queensland for example are prone to failure and serious overload. The inadequacies of Australia's telecommunications infrastructure to handle large-scale public emergencies are repeatedly exposed. In Christchurch, New Zealand in 2011 the NZ 111 service (the equivalent of our 000) was down in the critical first five hours after the earthquake.

6. After several Royal Commissions and Inquiries following natural disasters and terrorist incidents, the Council of Australian Governments decided in 2009 that police and emergency services must move to seamless communication so that they become 'inter-operable' – so that they can communicate across State and Territory boundaries, and across organisational boundaries. As at April 2011, this has not been realized and the lack of interoperability remains a major and significant impediment to effective operational capacity of our front-line services. It impedes their capacity to save lives and minimize damage to property and infrastructure which cost the nation so dearly in terms of both economic and social costs.

7. Our public safety agencies–police, emergency services, fire authorities and ambulance services–in each State and Territory and federally, currently communicate largely over the 400 MHz band (narrowband) which is limited to voice communications. These are standalone networks (<u>not</u> networks provided by commercial carriers) designed and built by the public safety agencies to 'importance level 1' to ensure the necessary reliability, capacity, security and redundancy. These standards are not applied by the commercial carriers. Even so, those networks of the public safety agencies are severely limited–they are limited to narrow band voice communications and they are not interoperable.

8. To be frank, a 16-year old with a Smartphone has a more advanced communications capability than many first responder police officers or emergency services personnel, which is a disgrace in a technologically savvy country like Australia.

THE *RADIOCOMMUNICATIONS ACT 1992*

9. When the Keating Government embarked on radical market-based reform of spectrum allocation in 1992 they foresaw that a problem would arise, namely how to

[1] AAP, 11 January, 2011, *The Australian*, 14 January 2011 and *The Australia*, 1 February, 2011.
[2] *The Australia*, 3 February 2011.

ensure that non-commercial users like police and emergency services had affordable access to spectrum into the future. Recognising that these not-for-profit public safety agencies could not compete in an open market system against the big telecommunications companies for a rare commodity, the Government built a series of safeguards into the *Radiocommunications Act 1992*.

10. The Act specified that the system must make adequate provision of spectrum for law enforcement and emergency services. Charging for spectrum must also take into account the value of non-commercial use of spectrum. In other words, the public safety agencies should not be expected to pay the commercial rate for their spectrum. Finally, the Act provided for spectrum to be reserved for these essential public purposes so that they would not have to compete at auction for spectrum. These safeguards need to be upheld in 2011 in relation to the 700 MHz band as the big telcos vie for spectrum at the expense of public safety and the public interest.

11. We believe it is the responsibility of the Government and ACMA under that Act of Parliament to ensure that the spectrum needs of law enforcement and emergency services are directly met and not to send these public safety agencies to do the best deal they can with one or more of the major telecommunications companies at commercial rates. In our opinion, this responsibility of Government, which is in the national interest, is not currently being met. The Government and ACMA have failed to meet the objects of the Act.

WHAT LAW ENFORCEMENT AND EMERGENCY SERVICES NEED IN THE PUBLIC INTEREST

12. Public safety agencies have **zero** broadband spectrum. As a result, they are severely disadvantaged and denied access to exploit the emerging technologies currently available and being developed to enhance emergency service operations. And yet public safety agencies have unique and demanding voice and data requirements that cannot be met by the commercial networks. There is no commercial imperative for the commercial carriers to compromise their revenue from their mainstream customer base by reserving capacity and hardening their networks to meet public safety requirements.

13. Australia's public safety agencies need to move to a contemporary, 21st century communications system which can handle mobile voice, data, video and broadband communication over a secure, hardened network which has the capacity, reliability, security and redundancy required.

14. The crime fighting aspect of police work means that, uniquely, they need secure communications which cannot be breached by terrorists or by organized crime and are not owned by foreign governments or entities. Imagine the public outcry if a police operation against a terrorist incident was stymied because of communications leaks via a foreign carrier.

15. Providing law enforcement and emergency services with dedicated access to mobile broadband services would enable our public safety agencies to:

    - upload streaming video from an emergency scene like a flooding CBD to a command centre;

    - download high resolution maps, images and plans of an approaching bushfire to an emergency scene;

    - upload audio, video and other data from a criminal surveillance operation like a terrorism incident to a police command centre; and

    - download plans of a burning city tower into the hands of the fire fighters entering that building to save lives.

16. The advantage of access to mission critical mobile broadband services is in the provision of real time situational awareness when public networks fail due to congestion or network failure. Making mobile broadband available for police and emergency services would ensure that our public safety agencies have the following capabilities:

    Coordination of evacuations

    Real time information can be communicated from the field to operations centres and vice versa.

    This would allow evacuations to occur in an efficient and effective manner at a time when emergency services are likely to be at full stretch. This would also provide reassurance and increased confidence to the community.

    Disaster victim registration

    An officer evacuating an area could provide real time information back to the operations centre advising the details of an evacuee and any special needs.

    They could be directed to the most appropriate evacuation centre where there details would be made available to confirm their safe arrival. The information would be disseminated in real time to transport, health and welfare so that support arrangements could be coordinated and their safety confirmed with relatives. The location and details of anyone refusing to evacuate could be centrally recorded.

    Recognisance

    Emergency service officers could attend the scene of an incident/emergency and provide an immediate situation report by streaming video of the scene back to an operations centre.

This information could be triaged from a central location in order to deploy appropriate resources and map affected areas. Details of injured persons could be forwarded in advance of the patient arriving at hospital to provide hospital staff with the best chance of improving survival rates. Damage to critical infrastructure would be quickly established, dramatically reducing the time to restore services or coordinate transport plans.

Safety of emergency services personnel

Real time information could be sent to officers in the field advising of approaching hazards and safe escape routes.

Rural fires

Fire fighters could provide real time information to an operations centre on the direction and intensity of bush fire fronts, local fuel sources and wind conditions. This intelligence would be utilised to predict emerging risks and provide early advice to fire fighters and the community. Personnel caught in hazardous situations could be provided accurate advice on approaching fire fronts and be directed to the nearest safe place by the safest possible route.

Urban fires

In the case of building fires, information could be sent to fire fighters detailing the layout of buildings to assist in quickly identifying the likely location of anyone caught in the blaze.

This is the example used by President Obama in his 2011 State of the Union address when he announced that USA emergency services would get 20 MHZ of the 700 MHz band.

Details of known hazards could also be sent to prevent the likelihood of the fire spreading or the officers being injured. Personal issue devices would automatically monitor the air quality and disseminate information back to an operations centre to assist in the early identification of hazards that may cause respiratory problems for officers or the local community. Video streamed back to the operations centre could be monitored by forensic and criminal investigators in real time to assist in the early identification of the cause and source of the fire.

Intelligence Gathering

Access to mission critical mobile broadband data allows reliable, quality information to be sent from the field to an operations centre in real time.

This in turn allows Emergency Services and community leaders to meet the demand for very accurate and timely information to be provided to the public through the various media outlets.

17. With the move in Australia from analogue to digital television, 126 MHz of the 700 MHz band is to become available by 2013. The Gillard Government is considering auctioning this band of radio communications spectrum which the Minister for Broadband, Communications and the Digital Economy, Senator Stephen Conroy calls the 'Digital Dividend'. The Australian Communications and Media Authority is currently planning the auction of the 126 MHz of spectrum to take place in the second half of 2012. This spectrum is likely to be allocated via 15 year, renewable licenses, meaning that this opportunity for public safety agencies to secure spectrum may not be available again for 30 years. So this is truly a once-in-a-lifetime opportunity.

18. The 700 MHz band is special. That is why it is sometimes referred to as 'the waterfront property' of spectrum. It is special because communications in this band can carry large amounts of data, at high speed, over long distances, and can penetrate buildings. It is ideal for mobile broadband services and for emergency and policing services at critical times of national emergency when normal radio and telephone communications are pushed to the limit or severely overloaded past breaking point.

19. This is not just an issue in Australia. In the USA, President Barack Obama in his 2011 State of the Union address foreshadowed and subsequently announced that he was allocating 20 MHz of the 700 MHz band (which they call D-Block) to the USA's public safety agencies. Members of Congress from both sides of the aisle, Democrat and Republican, are proposing Bills to allocate that 20 MHz for what they call their first responders – the police and emergency services across the USA. The 9/11 Commission, after the World Trade Centre terrorism attacks in the USA, recommended this network to reduce USA vulnerability to further terrorist attacks. Canada is also moving to reserve 20 MHz. The European Union is considering doing likewise.

20. All of Australia's Police Commissioners from every State and Territory and the AFP have agreed that they need 20 MHz (10 +10 MHz paired) of this newly available 700 MHz band to establish a leading edge network for law enforcement and emergency services agencies. Premiers have written to Ministers and the Prime Minister supporting a proposal that the Gillard Government reserve 20 MHz for these vital essential services in the national interest. The matter was also raised at the February 2011 meeting of COAG. The Australasian Fire Authorities Council and the Council of Ambulance Authorities are each supporting the proposal. (Copies of letters from Commissioners, Premiers, AFAC and CAA are attached.)

21. They are all convinced that it is not prudent or feasible to rely on commercial carriers from which they would buy the necessary communications services. They would essentially be at the mercy of a monopoly commercial carrier as far as price and

quality of service are concerned. There are also serious concerns surrounding capacity, redundancy, security and reliability needed for such 'mission critical' purposes. Foreign ownership of such a carrier would jeopardize national security of critical information and communications.

22. Unfortunately, bitter experience has shown that commercial communications services almost always fail the police and emergency services. They are not set up to provide the kind of guaranteed, failsafe, secure system these emergency services must have. Their networks are not built to 'importance level 1' that police require. Outdated, overstretched police and fire service networks also fail.

23. There are essentially two alternatives to the proposal to reserve 20 MHz of the 700 MHz band for public safety agencies. One is to insist that police and emergency services buy their communications services from commercial carriers, which in effect means that they rely on Telstra which is the only carrier with the reach they need across all of Australia. This is the 'leave it to the free market' option. This leaves our public safety agencies at the mercy of Telstra whose systems are not built to 'importance level 1' which police and emergency services need for reliable, robust communications that survive natural disasters.

24. The other option is to impose conditions on the commercial carriers which are successful in buying 700 MHz spectrum at the forthcoming auction. Such conditions would aim to ensure that the carriers meet the needs of police and emergency services–robustness, priority, security. This approach was tried by the Obama Administration in the USA in 2008 and failed because the carriers did not want to take on the onerous requirements that were necessary to meet the needs of first responders. (Subsequently, President Obama reserved 20 MHz for first responders in January 2011.) On the other hand if only 'mild' conditions were imposed, the needs of first responders would not be achieved. We know that commercial carriers' systems regularly fail during natural disasters.

25. If it is correct that climate change will cause more severe natural disasters in the future, we need to ensure now that our emergency services have the best possible chance of saving lives.

26. The incredible potential of the Digital Dividend is why all Australia's Police Commissioners, including the AFP, are seeking 20 MHz of the 126 MHz. That is just **16%** of the spectrum that will soon be available, a reasonable position that allows commercial users the majority of the spectrum.

27. In fact, what the public safety agencies are seeking is just **2%** of the total spectrum that can accommodate broadband operations. By contrast, the commercial carriers currently occupy 703 MHz of spectrum. If they are allocated the full 190 MHz from the 2.5 GHz as they propose, plus all of the 126 MHz of the 700 MHz Digital Dividend, they will have 1,019 MHz of bandwidth to roll out 4G technology.

28. Clearly, the Government wants to achieve for the Australian taxpayer the best return it can from the 'Digital Dividend'. It's a valuable commodity and the proceeds can help to bring the Federal Budget back into surplus by 2012-13 as promised. In addition, there will be fierce competition between carriers for the limited spectrum available – 126 MHz.

29. Apart from the demands of the commercial carriers, the only argument for not agreeing to 20 MHz is to maximize revenue from the auction as a contribution to deficit reduction. This puts profit before public safety and the national interest. But under our plan to reserve 20 MHz, **84%** will still be available for auction.

30. We understand that there is an Access Economics report commissioned by the Attorney-General's department which says that even if 20 MHz was reserved for public safety, the revenue raised at auction may not fall. The spectrum is rare and valuable and may become more-so.

31. This is a once in a lifetime opportunity because it is rare for spectrum of this quality and size to become available. By supporting this proposal Senators will be putting future public safety front and centre. You will be proposing the setting aside of the spectrum necessary for effective 21st century mobile communications for future disasters and other critical incidents like terrorist attacks.

32. The recent natural disasters in Australia and New Zealand over the summer of 2010-2011 should be sufficient wake-up call to all of us to act on the united call of Australia's Police Commissioners to set aside spectrum for their public safety functions.

RECOMMENDATION

33. The PFA recommends that the Committee proposes to the Government that it reserves 20 MHz of the Digital Dividend 700 MHz band for law enforcement and emergency services so that these agencies can, into the future, provide the Australian community with more effective preparation for, responses to and recovery from emergencies and natural disasters

Senator Stephen Conroy
Minister for Broadband, Communications and the Digital Economy
Parliament House
CANBERRA ACT 2601

Dear Senator Conroy,

The Digital Dividend, which is to become available when the changeover from analog to digital television occurs, is of great importance to Australia.

It is also of major significance to the States and Territories because of the requirement of law enforcement and emergency service agencies to maintain an effective and modern 21st Century communication capacity.

We understand that the Government will soon consider whether or not, and if so, how, the needs of law enforcement and emergency management – the public safety agencies – are to be met in the process of allocating the freed-up 126 MHz of the 700 MHz Digital Dividend.

We note that the *Radiocommunications Act 1992* (Cth) requires the Australia Media and Communications Authority (ACMA) to 'make adequate provision of the spectrum - for use by agencies involved in the defence or national security of Australia, law enforcement or the provision of emergency services'. It also recognises that charging for the use of spectrum should take account of these non-commercial uses.

It is understood that the ACMA and the Department of Broadband, Communications and the Digital Economy are not proposing to reserve any of the 700 MHz Digital Dividend for public safety agencies but are recommending that if public safety agencies require access to the 700 MHz band, that they enter into commercial arrangements with the major carriers of communications services in that band. The ACMA's recent Discussion Paper, *Spectrum reallocation in the 700 MHz digital dividend band,* does not deal with the needs of law enforcement and emergency services but proposes to allocate all the available spectrum to the highest bidders through an auction process in the second half of 2012. Non-commercial public safety agencies could not compete with profit-making commercial entities in bidding for spectrum at auction.

The 700 MHz segment of spectrum has many advantages over other bands; particularly wide area coverage for broadband mobile communications. As a result, it is variously described as the 'waterfront property' or the 'dress circle' spectrum, is

highly valued for a wide range of mobile and fixed communications services, and will be much sought after for uses such as mobile broadband services.

The collective law enforcement and emergency services community, including most recently Police Commissioners, have assessed that 20 MHz of the 700 MHz spectrum (2 x 10 MHz) is needed for mobile broadband communications. It can accommodate our data, video and high-speed broadband communications needs, especially during emergencies, natural disasters and major public events such as New Year's Eve and international events like CHOGM. This is the same amount of 700 MHz spectrum requested for public safety agencies in the USA and Canada, and is also proposed in Europe. It is essential for 'mission-critical' radio-communications during life-threatening events and events where the risk of terrorism is acute.

Police and emergency services have experienced the extreme problems bought about by a lack of suitable and reliable spectrum and priority for public safety purposes. The 2009 Victorian Black Saturday bushfires - in which 173 people lost their lives - highlighted emergency services communication failings and the the critical need for interoperability between Emergency Services Organisations plus provision of common voice, data and personnel alerting infrastructure and capability for fully effective state-wide communication.

In addition, the needs of contemporary policing work on the frontline in every Australian city and town increasingly relies on real-time data provision in a mobile setting for which fast, reliable communications and data exchange are essential. For example, frontline police on the road are now accessing data about motor vehicle licence plates, vehicle registrations, and drivers in ways that were not possible a few years ago. Criminal history is accessed remotely. Police pursuits and criminal investigations are also managed remotely by supervisors through the communications system. Security, reliability, redundancy and priority access are essential characteristics for this work and for other 'mission-critical' emergency work by police, emergency services, fire authorities and ambulance services, features which commercial communications carriers do not, as a matter of course, ensure.

The Council of Australian Governments (COAG), through the Inter-operability Framework, has agreed on the need for harmonisation and greater inter-operability between law enforcement and other public safety agencies. Reservation of 20 MHz of spectrum would be a major step towards this COAG commitment, and in Australia's public interest. It is argued that it would not be prudent for the Commonwealth to leave this matter to whatever arrangements can be struck by each public safety agency with a dominant commercial carrier, where the resources and bargaining power of the respective parties are so mismatched.

Ultimately, it is strongly suggested that it would be possible, with the 126 MHz of 700 MHz spectrum available, for the Australian Government to both utilise the proceeds of the Digital Dividend to meet fiscal consolidation targets and provide public safety agencies with the 20 MHz of spectrum required.

It would be appreciated if you could urgently consider the above proposal, prior to any plans for a Digital Dividend auction proceeding.

Yours sincerely,

Andrew Scipione, Commissioner, NSW Police Force

Simon Overland, Chief Commissioner, Victoria Police

Bob Atkinson, Commissioner, Queensland Police Service

Mal Hyde, Commissioner, South Australia Police

Karl O'Callaghan, Commissioner, Western Australia Police

John McRoberts, Commissioner, Northern Territory Police

Darren Hine, Commissioner, Tasmania Police

Roman Quaedvlieg, Chief Police Officer, ACT Policing

Michael Phelan, Acting Commissioner, Australian Federal Police

ANZPAA
Australia New Zealand Policing Advisory Agency

afac
Australasian Fire and Emergency Service Authorities Council

THE COUNCIL OF AMBULANCE AUTHORITIES

7 January 2011

Senator Stephen Conroy
Minister for Broadband, Communications and the Digital Economy
Parliament House
CANBERRA ACT 2601

Dear Senator Conroy,

We are writing to you in the interests of community safety and the safety of the nearly 350,000 ambulance, fire, police and state emergency service personnel across Australia to strongly request that you enable the provision of a dedicated 20 MHz (2x10MHz paired) allocation within the freed-up 126 MHz of the 700 MHz Digital Dividend to public safety agencies.

We are concerned that currently the Australian Media and Communications Authority (ACMA) and the Department of Broadband, Communications and the Digital Economy (DBCDE) are not proposing to reserve any of the 700 MHz Digital Dividend for public safety agencies to ensure sufficient broadband data networks exist to support the critical business needs of emergency services.

In our view, the suggestion that public safety agencies requiring access to the 700 MHz band can enter into commercial arrangements with the major carriers of communications services in that band does not fully recognise how community safety is delivered both during major emergencies (e.g. bushfires, floods, terrorist incidents, etc), major events (e.g. New Years Eve, CHOGM) and on a daily basis. Commercial provision can not and would not be able to account for our needs as they are not dimensioned to meet critical requirements especially during high use periods (e.g. New Years Eve celebrations in capital cities) when their services can congest to the point of failure.

The ACMA Discussion Paper (*Spectrum reallocation in the 700 MHz digital dividend band)* recommends all available spectrum be allocated to the highest bidders through an auction process in the second half of 2012. In our view, this compromises the public interest and community safety for a financial dividend. It has the potential to undermine fully effective communication and interoperability between emergency service agencies at a time when recent Royal Commissions, coronial investigations and other significant public inquiries have examined communication issues within and between emergency services in detail. Aside from the risk to life, we are concerned that this proposal, should it be implemented, will provide fertile ground for future inquiries to criticise emergency service agencies and government at all levels.

ANZPAA
Australia New Zealand Policing Advisory Agency

afac
Australasian Fire and Emergency Service Authorities Council

THE COUNCIL OF AMBULANCE AUTHORITIES

European and United States standards agencies are targeting the 790-862MHz band for public safety broadband communications. These two markets will drive equipment research and investment by manufacturers and, for these reasons, it is essential that Australia is aligned with the public safety frequency allocation in these jurisdictions.

We urge you to allocate sufficient 700 MHz spectrum, consistent with the frequency ranges that have been requested in the USA and Canada (and proposed in Europe), to ensure emergency services can deliver their essential services without being beholden to, or compromised by, the vagaries of commercial providers.

Yours sincerely,

Jon White
Chief Executive Officer
Australia New Zealand Policing Advisory Agency

Naomi Brown
Chief Executive Officer
Australian Fire Authorities and Emergency Service Authorities Council

Lyn Pearson
Executive Director
Council of Ambulance Authorities

The Honourable Julia Gillard MP
Prime Minister
Parliament House
CANBERRA ACT 2600

Dear Prime Minister Julia,

I understand members of your Government have received letters from other jurisdictions regarding the changeover from analogue to digital television in Australia and the opportunity this creates for law enforcement and emergency services to access the freed up 126 MHz of the 700MHz 'Digital Dividend'.

I write to add my support to calls for the Commonwealth Government to make provision for law enforcement and emergency services when considering the future use of this spectrum.

I write to you is because I am advised that Commonwealth Government agencies are not proposing to reserve any of the 700 MHz Digital Dividend for law enforcement and emergency services purposes.

I am further advised that Police and Emergency Service agencies around Australia expect to require 20 MHz of the spectrum for future broadband and other needs.

I would appreciate your consideration of the New South Wales Government's views when you next consider allocation of the Digital Dividend.

Yours sincerely

Kristina Keneally MP
Premier

Cc Senator Stephen Conroy, Minister for Broadband, Communications and the Digital Economy

The Hon Robert McClelland, Attorney-General

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Premier of Queensland

For reply please quote: EP/PD TF/10/8237 – DOC/10/47189

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18 MAY 2010

Senator the Honourable Stephen Conroy
Minister for Broadband,
Communications and the Digital Economy
Deputy Leader of the Government in the Senate
MG70
Parliament House
CANBERRA ACT 2600

Dear Senator Conroy Stephen,

The 'Digital Dividend' resulting from the transition from analog to digital television is of great importance to Australia.

The Queensland Government recognises that the maximum cash dividend might be made by auctioning this spectrum to the highest bidder. Nevertheless, it is considered that a larger and perhaps more significant benefit could be obtained by reserving a portion of the spectrum for the use of law enforcement agencies and emergency services organisations.

Having reviewed the Digital Dividend Green Paper, the key contribution of the Queensland Government to the 'Digital Dividend' debate is on the critical issue of providing spectrum for emergency service organisations and law enforcement agencies. Given the importance of this issue, I felt it necessary to provide the Government's views directly to you separate to the broader Green Paper submission process.

On 7 December 2009, the Council of Australian Governments (COAG), 'agreed to a range of measures to improve Australia's natural disaster arrangements through more efficient and effective funding arrangements for natural disaster mitigation, relief and recovery; strengthened coordination and partnership between the Australian and state governments in preparation for, and in response to; disasters and the introduction of a framework for improving the interoperability of Radiocommunications equipment used by emergency services'. The Queensland Government, through its relevant agencies, is working towards implementing this framework by 2020.

Internationally, the move to digital television and the resultant available spectrum in the 700MHz band is being seen as a critical resource to support the future broadband data needs of law enforcement agencies and emergency services organisations.

Queensland Government

I understand that harmonisation in the United States of America (Region 2) is complete and two blocks of 12MHz have been specifically allocated for 'public safety' in the 763-775MHz and 793-850MHz section of the band. It is further understood that the European community (Region 1) is still planning their harmonisation but are considering submissions that propose more spectrum for public safety (2 x 15MHz).

The Queensland Government considers that the 'Digital Dividend' spectrum in the 700MHz band:

- offers very favourable propagation characteristics compared to other broadband spectrum options (2.5GHz) and therefore offers a strong economic value proposition
- is well suited in urban areas
- is also efficient in rural areas where fewer sites are required to cover an area, as the signal propagation is superior
- could dramatically reduce costs and the carbon footprint required to provide mobile broadband radio-communication and could significantly accelerate the deployment in underserved areas.

An alignment of Australia's spectrum allocations with the wider international community will have two key benefits:

- Australian law enforcement agencies and emergency services organisations will be able to purchase products and services from a larger market place making the Australian interoperability implementation more cost effective and widely supported
- Australian product developers will be able to develop radio based products for the Australian market that will have wider application in the global market.

I suggest that the requirements of law enforcement agencies and emergency services organisations need to be recognised by reserving a portion of the 'Digital Dividend' spectrum for their needs. This alignment would be best achieved in Australia by allocating spectrum in a similar way to that already agreed in the United States of America. Ideally, access to this spectrum should be provided at no cost to expedite the common use across jurisdictions.

COAG's endorsement of the Interoperability Framework provides strong recognition of the need for improved communications between law enforcement agencies and emergency service organisations. Interoperability will have flow-on social and economic benefits that will accrue to both the community and governments.

As governments, we have an obligation to provide the necessary resources for public protection and disaster relief. Spectrum for mission-critical mobile radiocommunications constitutes an important resource for the fulfilment of this obligation. I would appreciate your consideration of the Queensland Government's views when you are making your final decisions on the allocation of the 'Digital Dividend'.

Yours sincerely

ANNA BLIGH MP
PREMIER OF QUEENSLAND