

I imagine its far too late at this point, but basically all I have to say right now is to reiterate my long held position (and indicated to various govt bodies over time) that auctions for spectrum allocation are intrinsically wrong as a way to allocate same.

All they've done is indirectly moved a lot of money from superannuation funds, via failed dot.com's, into the government's consolidated revenue. While that might be a laudible goal for the government, it doesn't do a thing for the advancement of affordable wireless communications for its people.

Even when the company concerned doesn't go under in the process, all that spectrum auctions achieve at best is a form of indirect taxation of wireless communications (the money has to be recouped in higher wireless access fees over the period of the resulting license). Again, good for the government, bad for the users, and not a fair way to allocate spectrum.

Bluntly - the beauty contest model is fairer in terms of good 'people' outcomes, coupled with a requirement that if the spectrum isn't used, it needs to automatically revert to the govt to reallocate to someone else.

There is only one more thing less useful than auctioning air. That's auctioning it to a company that doesn't actually USE IT FOR ANYTHING, when there are other smaller companies (like, for instance, us), who could use it creatively, but who aren't prepared to spend ten times the network buildout costs on the right to use that air, when it completely messes up the economic model behind wireless broadband as a result.

Best wishes,  
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