



Minister for Emergency Services

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Mr Jonathan Coppel
Commissioner
Public Safety Mobile Broadband
Productivity Commission
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Dear Commissioner

Victoria's response to Public Safety Mobile Broadband Draft Report

Victoria welcomes the Draft Report into the most effective way to secure a Public Safety Mobile Broadband (PSMB) capability to support Australian public safety agencies, and has taken this opportunity to respond.

An interoperable PSMB network has immense potential to improve public safety across Australia and will lead to more efficient day to day and large scale emergency operations. The Draft Report adds significant analysis and observation to understanding the challenges and merit of deploying a national PSMB capability, however Victoria considers further analysis is necessary to clarify the key assumptions underpinning the findings and recommendations.

In the enclosed submission, Victoria identifies five key areas it considers must be addressed in the Final Report.

- The transition of voice to a PSMB capability – the long term requirements of public safety agencies include a voice capability, therefore any findings and recommendations in the final report need to accommodate the transition of voice services from existing narrowband networks within the planning horizon.
- The PSMB capability is under specified - the current assumptions around coverage, capacity and availability do not meet the current requirements of public safety agencies dealing with 'mission critical' situations on a daily basis, and Victoria will not consider a PSMB capability that does not have equal or better capability than what is achieved today on the current voice network.
- Procurement and competition - The Draft Report does not address the lack of contestability of the current market, nor the Commonwealth's role, powers and responsibilities in relation to this.

- The Commonwealth's role in delivering a PSMB capability - Victoria considers the Final Report should include stronger recommendations regarding the Commonwealth's role of ensuring an effective market for a PSMB capability and that adequate spectrum is available to public safety agencies.
- Spectrum and Opportunity Cost – Victoria does not agree with valuing spectrum used for public safety purposes at the opportunity cost of providing commercial 3G and 4G revenue generating services, and considers the social benefit of allocating spectrum for the “public interest” should be incorporated in the final report findings and recommendations.

Victoria's submission is attached for your consideration.

Victoria looks forward to the release of the Final Report in December and to working collaboratively with the Commission, the Commonwealth and all Australian jurisdictions to develop effective and efficient PSMB arrangements.

Yours sincerely

Jane Garrett MP
Minister for Emergency Services