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Mr Jonathan Coppel  
Presiding Commissioner  
Productivity Commission  
By email: PSMB@pc.gov.au



Australian  
Mobile Telecommunications  
Association  
ABN 98 065 814 315  
First Floor  
35 Murray Crescent  
Griffith ACT 2603 Australia  
PO Box 4309  
Manuka ACT 2603 Australia  
Ph +61 2 6239 6555  
Fax +61 2 6239 6577  
Web [www.amta.org.au](http://www.amta.org.au)

Dear Commissioner,

The Australian Mobile Telecommunications Association (AMTA) welcomes the Productivity Commission's draft report on Public Safety Mobile Broadband (PSMB).

AMTA strongly supports the draft report's finding that PSMB has the potential to improve the delivery of services by public safety agencies (PSAs) by enabling use of high-speed video, images, location tracking and other mobile broadband technologies. The needs and requirements of PSAs should steer the design of a holistic PSMB capability that is fully co-ordinated between PSAs and jurisdictions.

AMTA concurs with the report's finding that the costs involved in building a dedicated network for PSMB are likely to far outweigh the costs involved in adopting an approach that relies on commercial services. A commercial approach represents the most efficient, effective and economical way of delivering a PSMB capability to PSAs.

Mobile networks are expensive to build, operate and maintain. AMTA believes that the most efficient approach would be for a PSMB capability to leverage off existing commercial networks (including NBN wireless sites). Unnecessary duplication of infrastructure should be avoided. Industry members have well-established policies and processes in place to enable the sharing of physical infrastructure via the Mobile Carriers Forum (MCF) and similar commercial sharing arrangements should be considered in the design of a PSMB capability.

Subject to any new information emerging from the 2015 ITU World Radio Conference, AMTA recommends that the reservation of any additional spectrum for PSMB requirements should be from within the 806–824/851–869 MHz segment in the 800 MHz band, which has already been identified by the ITU for this purpose in Region 3. AMTA believes that the use of the 700 MHz spectrum for public mobile broadband services is a higher value use than reserving some of it for PSMB use. AMTA also agrees that if any spectrum is allocated to PSMB use it should be priced at its opportunity cost.

AMTA's members have a long history of working co-operatively with PSAs and are committed to ongoing engagement on this issue to ensure the Commission's recommendations lead to the delivery of an efficient and effective PSMB capability for Australia.

Yours sincerely,

Chris Althaus

**AMTA CEO**