***WAFarmers***

The Director
Spectrum Access and Management
Department of Infrastructure, Transport, Regional Development and Communications
2 Phillip Law Street
Acton ACT 2601

spectrumaccessandmanagement@communications.gov.au

<https://www.communications.gov.au/have-your-say/850900-mhz-auction-allocation-limits-exposure-draft>

**850/900 MHz Auction**

WAFarmers represents the broadacre farmers in Western Australia. Our membership covers the Southern West, Wheatbelt and Great Southern Regions of the State including 70 communities and over 5000 farming properties.

WAFarmers have concerns about the current structure of the 850/900 auction, which would leave us in a worse position in terms of spectrum for regional Australia.

The Government’s current proposal would have the effect of reducing the spectrum available across regional Australia which is not in the interests of our members and their communities.

* WA Farmers increasingly rely on technology and telecommunications to run and operate their businesses. This goes to the increasingly complex machinery on large scale properties, through to reliable connections to monitor weather patterns, market conditions and make general farm decisions.
* In our discussions with telecommunication providers like Telstra, we understand the importance of maximising coverage range. From the discussions we have with industry experts, we understand the need to have adequate spectrum in order to maximise capacity on the mobile network and for WA farmers this is something that we rely on everyday to operate our businesses.
* We are concerned that Telstra which a vast majority of our members rely on could end up with less spectrum that what it can access today.
* As an industry on principal, we also don’t support unnecessary regulation and restrictions from Government, particularly when that red tape impacts the effective operation of markets and stifles investment.
* Our concern with the proposed allocation limits relates to the impact this could have on a providers ability to service customers in regional Australia, particularly when the allocations do not reflect or match the investments being made by operators in expanding coverage.

***WAFarmers***

* With the increasing demand for data on farms, which is increasingly being transmitted over connections like 4G enabled networks, we are concerned about the negative impact this could have on connection speeds for our members.
* It is our opinion that all bidders should have a fair opportunity to participate and acquire the spectrum they need to serve their customers across Australia – not just now but across the twenty year licence period. And we are particularly concerned that if this equality is not provided that it will be regional Australians, like farmers in WA, who will be the most impacted. This is totally unacceptable and should not be allowed to occur.
* We also believe that an auction that has as few limitations as possible also provides the opportunity for greater competition and therefore revenue returns for the Federal Government, which we also believe should be considered given the budget deficits Australia is facing due to the impacts of COVID-19.

This submission can be made public.

***Trevor Whittington***

CEO WAFarmers

Great Eastern Highway

Belmont WA

trevorwhittingotn@wafarmers.org.au

0408258078

20 May 2021