



Amplitel's submission in response to the National RRAMP Draft Grant Opportunity Guidelines released July 2026

24 July 2026

1. Introduction

- 1.1 This submission is made by Amplitel Pty Ltd (**Amplitel**)¹ in response to the National Regional Roads Australia Mobile Program (**RRAMP, the Program**) Draft Grant Opportunity Guidelines released by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (**the Department**) in July 2026 (**Draft Guidelines**).

2. Executive Summary

- 2.1 Amplitel welcomes the Commonwealth's continued investment in telecommunications sites in regional and remote Australia that would otherwise be uneconomic. We support the Program and welcome that the Draft Guidelines reflect many of Amplitel's previous recommendations on the RRAMP as set out in our submission dated 30 May 2025.
- 2.2 This includes that the Program is technology neutral and does not dictate or favour any particular technology solution; includes Mobile Network Operators (**MNOs**) and Mobile Network Infrastructure Providers (**MNIPs**), has a clear objective and intended outcomes which are defined and reflected in Program assessment scoring; duly considers existing infrastructure and includes up to 100% funding for site upgrades to support co-location, includes funding coverage that covers both capital expenditure and operating expenditure and recognises that State, Territory and local government buy-in is important for deployment success.
- 2.3 The non-competitive, open application process adopted for the Program is a positive step which we think can encourage strong industry participation. Subject to addressing clarity of recovery of 'shovel-ready' costs, this framework can give industry viable opportunities to front-run sites, thereby reducing time to deploy under Program timeframes. If successful, this model could represent a robust framework to encourage commitment to future investment by industry and government.
- 2.4 To improve the intended outcomes of the Program and help ensure public investment is well targeted and delivered effectively and efficiently, we recommend that the Program and Draft Guidelines be amended to reflect as follows:
1. **Prioritise Existing Infrastructure and Multi-Carrier Co-location:** Applicants should have a positive obligation to assess the presence of existing infrastructure as part of the Project Application. This, together with the proposed funding percentages for site upgrades, supports the position that multi-carrier co-location on existing infrastructure presents the strongest value for money outcome under the Program. This obligation would be an effective mechanism to avoid infrastructure overbuild and to encourage the best value for money outcomes;
 2. **'Shovel-ready' Costs Recovery:** A balanced approach to 'shovel-ready' cost recovery is required, including additional clarity on what is intended to be funded. It is important that there is a balanced approach to risk taken by industry for these costs. Without a mechanism for cost

¹ More information about Amplitel is set out in Annexure A

recovery for sites that fail to reach full 'shovel-ready' status, there is a risk that participation in the Program will be adversely impacted and we recommend the inclusion of such mechanism;

3. **Funding Allocations and Caps:** The mechanisms to reallocate unused funds under jurisdictional and applicant funding allocations should be efficient, timely and transparent;
4. **State, Territory and Local Government Project Endorsement:** The Department should provide a channel (point of contact) to help facilitate State, Territory and local government endorsement of potential projects; and
5. **Site Location Identification:** MNOs are best placed to identify sites to meet the Program objective and intended outcomes and limited restrictions should be placed on site identification.

2.5 We also again draw the Department's attention to the potential impact of ATO Ruling [TR 2006/3 | Legal database](#) on participation in funding programs.

2.6 Further details of Amplitel's recommendations are set out below.

3. **Prioritise Existing Infrastructure and Multi-Carrier Co-location**

3.1 The upgrade of existing infrastructure can result in the most efficient use of resources and public funding. Co-location delivers economic efficiencies, minimises visual impact, reduces duplication of public investment and supports the Program's objective and intended outcome of increasing multi-carrier mobile coverage. As a result, we welcome the inclusion of funding for upgrades to infrastructure to encourage efficient utilisation of existing assets. We support the funding percentages and project types as set out in paragraph 3.1 of the Draft Guidelines.

3.2 In addition to the above, applicants should have a positive obligation to assess the presence of existing infrastructure as part of the Project Application. This, together with the proposed funding percentages for site upgrades, supports the position that multi-carrier co-location on existing infrastructure presents the strongest value for money outcome under the Program. This obligation would be an effective mechanism to avoid infrastructure overbuild and to encourage the best value for money outcomes.

4. **'Shovel-ready' Costs Recovery:**

4.1 We welcome the coverage of 'shovel-ready' costs (up to the cap) as reflected in paragraph 5.3.2 of the Draft Guidelines and recognise that the 'shovel-ready' requirement proposed under the Program is intended to expedite deployment, reduce the risk of approval delays and mitigate site frustration events occurring after Projects have been awarded. Such an approach can reduce the risks of Projects failing to complete and provide confidence to applicants, government and communities that announced sites will complete to final "on-air" status. However, further clarity and a balance of risk (particularly on sunk costs for failed sites) is recommended to ensure an optimal level of participation in the Program and therefore, outcomes.

4.2 At the outset, additional clarity is required on the application of 'shovel-ready' cost coverage where a site does not proceed to full 'shovel-ready' status. It is not clear from the Draft Guidelines whether costs incurred on sites that meet the eligibility and value for money requirements but do not reach full shovel-ready status due to external factors (such as planning refusal) could be eligible for any cost coverage.

4.3 We note the comments in paragraph 3.4.1 of the Draft Guidelines that quarterly reviews will consider *"information from registered applicants about projects going through the approvals process to reach the 'shovel-ready' stage"*, which appears to contemplate engagement with the Department at an early stage (ie: pre-Project Application) in terms of potential Program sites. We recognise that other sections of the Draft Guidelines indicate that sites must be 'shovel-ready' at the time of Project Application and execution of the Grant Agreement.

4.4 If 'shovel-ready' costs recovery is not currently contemplated for sites that do not reach full 'shovel-ready' status, we recommend that a mechanism for such costs recovery be included as part of the Program

funding framework. Without such costs coverage, the risk is that potential sites that would otherwise meet the eligibility and assessment criteria and deliver value for money would not be pursued by applicants at the risk of those sites not meeting full 'shovel-ready' status due to circumstances beyond the applicant's control, such as planning approval or power connection. The nature of locations being targeted by the Program are those which are otherwise uneconomic and have attracted limited industry investment to date, so potentially make this likelihood higher.

- 4.5 We suggest that to make the 'shovel-ready' model more effective and to see better Program outcomes, potential Projects should be agreed with and approved by the Department before any 'shovel-ready' works commence. For those approved projects, and even if the Grant Agreement has not been executed, the sunk costs of 'shovel-ready' activities should be fully reimbursable even where those activities do not ultimately result in a delivered project, for example where approvals, land access, feasibility or other pre-build constraints prevent progression to full 'shovel-ready'.
- 4.6 We therefore recommend that the Draft Guidelines expressly provide for an agreed 'shovel-ready' mechanism, supported by clear cost recovery arrangements, such as agreed milestone payments for those sites that fail to reach full 'shovel-ready'.
- 4.7 It is also important that terms and conditions of participation relating to 'shovel-ready' costs recovery are agreed up front, whether through the Grant Agreement or some other funding agreement, to ensure there is a clear understanding of what costs are covered so that applicants can move forward with confidence on funding expectations and risk acceptance.
- 4.8 In any event, all costs incurred by the applicant to reach 'shovel-ready' status as described in paragraph 5.1.3 of the Draft Guidelines should be eligible, as opposed to the narrower list of costs set out in paragraph 5.3.2. The eligible costs in paragraph 5.3.2 do not cover, for example, costs associated with site acquisition and power connection, which form part of the 'shovel-ready' requirements in paragraph 5.1.3. The funded costs should be directly linked to 'shovel-ready' as described in the Draft Guidelines (up to the cap.)

5. **Funding Allocations and Caps**

- 5.1 We note the inclusion of jurisdiction and applicant funding allocation caps in the Draft Guidelines, which is a sensible and fair approach. We welcome the proposed flexibility to review funding allocations each quarter during the application period.
- 5.2 We recommend that the mechanism to reallocate unused funds be efficient, timely and transparent. Registered applicants should have clear visibility of available funding and the reallocation process should be communicated in a timely manner to enable forward planning and continued investment.

6. **State, Territory and Local Government Project Endorsement**

- 6.1 We welcome recognition in the Draft Guidelines that State, Territory and local government written endorsement is a key aspect of Project success. This is an important mechanism to help front-run and facilitate various regulatory requirements, including the necessary planning approvals, and to ensure that funded projects align with jurisdictional priorities.
- 6.2 In light of the sometimes long lead times involved with government approvals, we recommend that the Department provide a channel (point of contact) to help facilitate State, Territory and local government endorsement of projects. Escalated engagement through the Department will help assist in resolving approval delays and support the timely delivery of Program outcomes.

7. **Site Location Identification**

- 7.1 Amplitel's MNO customers are best placed to identify sites that meet the Program's objective and intended outcomes, having regard to their existing network coverage, customer requirements and deployment strategies. We recommend that limited restrictions are placed on site identification. Industry-

led site identification, within the parameters of the Eligible Locations Database, will lead to industry participation and the most efficient and effective delivery of the Program.

8. **Impact of ATO Ruling TR 2006/3**

- 8.1 In terms of Program participation more generally, we reiterate our previous comments to the Department and refer to ATO Ruling [TR 2006/3 | Legal database](#) that could have an impact on the effectiveness of government funding in enabling the deployment of new infrastructure, which may in turn impact on program participation and decisions regarding specific sites. The Ruling:
- 1) applies to recipients of government payments, which include payments to fund the building or construction of depreciating assets; and
 - 2) states that “a Government Payment to Industry (**GPI**) that assists a business to carry on its activities and is ... a bounty or a subsidy; capital in nature; and received in relation to carrying on a business, is assessable under section 15-10 in the income year in which it is received”.
- 8.2 The ruling includes a number of examples, including the example of the construction of a renewable energy plant. While not exact, the example contains a similar fact pattern to funding under mobile co-funding programs, and the example stipulates that GPI is assessable in the year it is received.
- 8.3 The treatment of grant payments is also recognised in previous co-funding program guidelines. For example, under MBSP8, the guidelines states that “*Grants are assessable income for taxation purposes, unless exempted by a taxation law. The department recommends that Grantees seek independent professional advice on their taxation obligations or seek assistance from the Australian Taxation Office. The department does not provide advice on an applicant’s particular taxation circumstances.*”
- 8.4 Depending on each potential participant’s specific position, payments made under the mobile co-funding programs could fall under this ATO Ruling and if that is the case, will therefore amount to assessable income in the year the funding is received.

Annexure A

About Amplitel

Amplitel was established on 1 September 2021 following the transfer of the towers business of Telstra Corporation Ltd to Amplitel and sale of a 49% interest in that business to a consortium of investors. This consortium includes the Future Fund, Australian Retirement Trust, Commonwealth Superannuation Corporation and Morrison & Co Infrastructure Partners. The Telstra group continues to hold 51% of Amplitel.

Amplitel is an MNIP and provides most of the passive infrastructure assets at a communications site required to establish and operate a telecommunications tower. These include land, security fencing, access tracks, the tower and connection to the power network (where available). The active assets (those that require power to operate or can transmit data) are provided and operated by Amplitel's customers. In addition, some passive assets (such as equipment huts) which are unique to a customer's equipment will be provided by the customer.

Amplitel is the largest provider of towers infrastructure across Australia. We operate over 8,000 towers, masts, poles, and other structures². Amplitel also has access to Telstra's equipment building rooftops and street side poles. Amplitel is not an MNO nor a carrier and we do not supply carriage services. Our customers include MNOs, public emergency network and private radio and wireless network operators, major corporations, government and not-for-profits.

² Amplitel's tower locations are available at <https://www.amplitel.com.au/tower-locations>