21 October 2020

The Director

Spectrum Access and Management

Department of Infrastructure, Transport, Regional Development and Communications GPO Box 594

Canberra ACT 2601

By email: spectrumaccessandmanagement@communications.gov.au

To the Director

Re: Designation of spectrum in the 3.4 GHz band for spectrum licensing—Consultation Paper

TPG Telecom Ltd (**TPG**) welcomes the opportunity to provide its comments in regard to the above consultation paper.

TPG understands the Minister is considering whether to designate parts of the spectrum in the 3.4 GHz band for allocation by spectrum licences with respect to specified areas. These areas include Adelaide, Brisbane, Canberra, Melbourne, Perth and Sydney, and major regional centres (as outlined in the consultation paper).

The purpose of this proposed designation is to enable the ACMA to convert NBN Co’s apparatus licences in the

3.4 GHz band to spectrum licences. This then facilitates the defragmentation of Optus and NBN Co’s 3.4 GHz spectrum holdings and enables the ACMA to resume NBN Co’s unused 3.4 GHz spectrum covering urban areas in the Australian capital cities.

TPG supports the proposed designation, and the intention to defragment the band and to excise the unused spectrum. TPG is particularly supportive of the urban excise as this highly valued 5G spectrum has been left unused since NBN Co was granted access to its 3.4 GHz spectrum holdings. Furthermore, NBN Co has no foreseeable use for its urban spectrum and if it remains unused it will be a significant loss to the public.

In this regard, TPG notes that the consultation paper does not provide many details regarding the Government’s plan to put this unused spectrum to the market. We urge the Government to develop concrete plans and a timetable for doing so.

If you have any further questions, please contact me or

Yours sincerely

Group Executive Legal & External Affairs

Public



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