



Australian Mobile  
Telecommunications  
Association

12<sup>th</sup> August 2022

State Planning Office  
Department of Premier and Cabinet  
GPO Box 123  
Hobart TAS 7001

Sent via email: [yoursay.planning@dpac.tas.gov.au](mailto:yoursay.planning@dpac.tas.gov.au)

Dear Sir/Madam

### **MCF Submission on the 2022 SPP Review Stage 1**

Thank you for the opportunity to make a submission to the State Planning Office in relation to the above matter on behalf of the members of the Mobile Carriers Forum (MCF) namely: Telstra, Optus and Vodafone (part of TPG Telecom Ltd). The MCF is a division of the Australian Mobile Telecommunications Association (AMTA) and deals specifically with social, environmental, policy and regulatory issues related to the deployment and operation of mobile phone networks.

In the enclosed submission, the MCF has highlighted the importance of a regulatory framework that supports the provision of reliable mobile telecommunications infrastructure in Tasmania, including for the continued investment in upgraded and new networks, and to extend networks to fill mobile blackspots. The MCF considers that there is a clear necessity to revise the Telecommunications Code within the SPP and add to the provisions that are permit exempt for telecommunication infrastructure developments that have a low or negligible impact.

In light of the significant research of the importance of Telecommunications Deployment, the MCF requests a **Stage 2 SPP Detailed Review** of the C5 Telecommunications Code and the TPS that will assist to achieve the key findings of the above-mentioned reports and Tasmanian and local Governments' own published findings on Digital Infrastructure and Inclusion. We note that gaps and blackspots in mobile connectivity limit business and tourism. Connectivity is also critical in responding and recovering from natural disaster and other emergencies and in maintaining the safety of the community and visitors.

I can be contacted on 0425-702-007 or via email on [matt.evans@amta.org.au](mailto:matt.evans@amta.org.au)

Yours sincerely,

Matt Evans  
**Mobile Carriers Forum**  
Australian Mobile Telecommunications Association Ltd

12 August 2022

## Mobile Carriers Forum Submission on the 2022 SPP Review Stage 1

Thank you for the opportunity to make a submission to the State Planning Office in relation to the above matter on behalf of the members of the Mobile Carriers Forum (MCF) namely: Telstra, Optus and Vodafone (part of TPG Telecom Ltd). The MCF is a division of the Australian Mobile Telecommunications Association (AMTA) and deals specifically with social, environmental, policy and regulatory issues related to the deployment and operation of mobile phone networks.

### Terms of Reference

*Under the Land Use Planning and Approvals Act 1993 (LUPAA), the SPPs are required to be reviewed every five years. Regular review of planning instruments is considered best practice to:*

- *improve how they achieve their purpose,*
- *apply improvements in knowledge and policy, and*
- *give people and groups a chance to provide their views on how those planning instruments are working, and to suggest improvements.*

*The SPPs review will occur in two stages. The Government has commenced the first stage with the release of this scoping paper for public comment. The feedback you provide will assist in identifying the key themes or parts of the SPPs that require detailed review.*

*Submissions are requested to consider:*

1. *Which parts of the SPPs do you think work well?*
2. *Which parts of the SPPs do you think could be improved?*
3. *What improvements do you think should be prioritised?*
4. *Are there any requirements that you don't think should be in the SPPs?*
5. *Are there additional requirements that you think should be included in the SPPs?*
6. *Are there any issues that have previously been raised on the SPPs that you agree with or disagree with?*
7. *Are there any of the issues summarised in the Review of Tasmania's Residential Development Standards – Issues Paper that you agree or disagree with?*

### Background/ Summary

On behalf of its' members the MCF has made numerous submissions to Councils, the TPC and the Minister for Planning since 2009 highlighting the need for improvements to State and Local Planning policy and assessment provisions for Telecommunications across Tasmania.

The introduction of the C5 Telecommunications Code in 2017 had the effect of removing all Acceptable Solutions under many local planning scheme Telecommunications Codes.

Whilst the MCF welcomes a consistent, state-wide Telecommunications Code under the SPPs, the C5 has had the effect of placing more onerous and restrictive development standards for the deployment of Telecommunications Networks.

All Telecommunications deployment that does not fall under the provisions of the *Federal Telecommunications Act 1997* and the *Low Impact Facilities Determination 2018 (as amended 2021)*, require a Discretionary Permit under C5.

Since the last SPP review in 2017, there have been significant evolutions in the technologies of mobile networks. Specifically, 5G is the 5th generation of mobile networks, a significant evolution of today's 4G networks.

There have been several key reports undertaken by both industry and government that highlight the importance of 5G and future technology deployment in Australia.

Key to this research and relevant to telecommunications deployment in Tasmania are the following publications and submissions:

1. *5G Unleashed: Realising the potential of the next generation of mobile technology*, Deloitte Access Economics, Australian Mobile Telecommunications Association 2022
2. *Federal 2021 Regional Telecommunications Review - A step change in demand*, 14 February 2022
3. *Local Government Association of Tasmania (LGAT) submission on the 2021 Regional Telecommunications Review*, 30 September 2021
4. *The Tasmanian Premier's Economic and Social Recovery Advisory Council (PESRAC) Final Report*, March 2021.

It is noted that currently Telecommunications do not feature in the SPP Review document; *Summary of issues previously raised on the SPPs*.

One of the Key Reference points in the SPP Review is to: *apply improvements in knowledge and policy*. There has been much work by Government and Industry as highlighted in the above documents that warrant a review of the SPP's specific to the deployment of Telecommunications and how to address the key findings of these reports and submissions.

The MCF request that Telecommunications be recognised under Stage 2 of the SPP review as requiring a detailed review of:

1. The TPS C5 Telecommunications Code
2. Exemptions provided for in 4.2 Exempt infrastructure use or development.
3. Restrictive Use classifications in various Zone provisions
4. Recognition of high priority Government Funded Projects.
5. Updating the purpose of the SPP and C5 Telecommunications Code to reflect the importance of Telecommunications Deployment and address Tasmania's current deficit in Digital Inclusion.

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*On digital inclusion, Tasmania is ranked as the most disadvantaged state<sup>1</sup>*

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The importance of regulatory and legislative frameworks that are reasonable, flexible and proportionate, as a means of supporting ongoing innovation and investment in mobile infrastructure cannot be underestimated. There is a disparity with the introduction of C5 Telecommunications Code in 2017 and current research and submissions relating to Technology and Telecommunications Deployment in Tasmania.

The MCF and its members would welcome the opportunity to contribute to a **Stage 2 Detailed Review** of C5 Telecommunications Code, 4.2 Exemptions and other areas within the SPP to ensure that future deployment recognises the economic, social and productivity benefits of efficient and timely telecommunications deployment, and better reflects the finding of current research.

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<sup>1</sup> Thomas, J, Barraket, J, Wilson, CK, Holcombe-James, I, Kennedy, J, Rennie, E, Ewing, S, MacDonald, T, 2020, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020, RMIT and Swinburne University of Technology, Melbourne, for Telstra, available at: [digitalinclusionindex.org.au](https://digitalinclusionindex.org.au)

## Current knowledge, research, and publications

### 5G Networks

5G is designed to meet the very large growth in data and connectivity of today's modern society, the internet of things with billions of connected devices, and tomorrow's innovations. 5G will initially operate in conjunction with existing 4G networks before evolving to fully standalone networks. The rollout of 5G will help meet Australians' growing demand for more data, with the Australian Communications and Media Authority (ACMA) reporting that the volume of data downloaded in Australia for the June 2020 quarter (retail NBN, retail non-NBN and mobile services) was 8.2 million terabytes, an increase of more than one-third compared to the June 2019 quarter (6 million terabytes) and this is set to continue.<sup>2</sup>

5G is the latest generation in mobile technology transforming Australia's business landscape. 5G networks deliver faster speeds, better reliability and improved capacity. It enables a range of technologies – such as drones, Internet of Things (IoT), Edge Computing, autonomous vehicles, and virtual reality. At the core of this technology sits a network and devices sector that is continually investing and innovating to enable mobile connectivity.

The Tasmanian Premier's Economic and Social Recovery Advisory Council (PESRAC) Report March 2021.

The Tasmanian Premier's Economic and Social Recovery Advisory Council (PESRAC) delivered its Final Report in March 2021. The purpose of the report is to provide advice to the Government on long-term recovery from the COVID-19 pandemic. Digital Infrastructure and Inclusion was identified as a critical enabler to economic and social recovery for Tasmania.

Key relevant findings:

#### Digital Infrastructure and Inclusion

*The State Government should take an active role in strengthening Tasmania's digital infrastructure, particularly in our regions.*

*The State Government should set clear whole-of-government Key Performance Indicators (KPIs) for closing the digital divide (with a focus on affordability, access, and ability) and provide funding to address the KPIs.<sup>3</sup>*

Key Statements in the Local Government Association Tasmania (LGAT) Submission: 2021 Federal Regional Telecommunications Review, 30 September 2021

This submission to the Federal Governments Regional Telecommunications Review identifies that:

*Accessible, effective telecommunications are critical for Tasmania. Our state faces significant challenges, many shared with other regional areas, but some more acute than other areas due to unique local circumstances. Tasmania has one of the most dispersed populations of any state, is ageing with the highest median age of any state and has the largest increase in the median age over recent times. As an island, we are critically reliant on telecommunications to connect with the rest of the country, and to the world, for social, cultural and economic reasons.*

*On digital inclusion, Tasmania is ranked as the most disadvantaged state. At the same time there is a widening gap between those that are digitally included and those that are not – on income (higher income; more included), age (younger; more included) and geography (more included in Hobart; less in other areas, particularly the north-west).*

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<sup>2</sup> The Communications and media in Australia—Supply and use of services 2019–20 [acma.gov.au](https://www.acma.gov.au)

<sup>3</sup> The Tasmanian Premier's Economic and Social Recovery Advisory Council (PESRAC) Report March 2021

*For local government services, digital access is a critical support that has only be accelerated by the COVID-19 pandemic.*

*Gaps and blackspots in mobile connectivity limit business and tourism. Connectivity is also critical in responding and recovering from natural disaster and other emergencies and in maintaining the safety of the community and visitors.*

*For urban areas, the continued rollout of higher speed mobile networks is important to support innovation for 'smart cities'.<sup>4</sup>*

Key findings of the *5G Unleashed: Realising the potential of the next generation of mobile technology*, Deloitte Access Economics, Australian Mobile Telecommunications Association 2022

The report titled: *Realising the potential of the next generation of mobile technology*, was commissioned by the Australian Mobile Telecommunications Association (AMTA) to examine the economic impact of adoption levels of 5G-enabled technologies and innovations, and the policy and regulatory principles required to support accelerated adoption.

While Australia has been a world leader in mobile telecommunications for decades and is currently ranked 3rd globally, it is at risk of falling to 9th by 2025 due to lack of business readiness for change and a policy regime that needs to be recharged.

Australian businesses were found to be slow when it comes to readiness for adoption of 5G despite 62% of businesses leaders across four sectors agreeing 5G will accelerate the growth of their business, with 59% saying they have no strategy to realise 5G and nearly 1 in 3 (30%) having no plans to implement 5G. The report's economic modelling estimates 5G will increase Australia's GDP by \$67 billion by 2030 based on the current trajectory for adoption, however an additional \$27 billion can be realised by maintaining Australia's global leadership position through accelerated adoption – a 40% uplift in economic benefit over nine years.

The Key points for government in the report are:

- *Australia is a global leader in 5G mobile, but needs to accelerate uptake and investment to maintain its lead on other countries*
- *If Australia can maintain its current position amongst global leaders, this creates an extra \$27 billion in economic benefits to GDP by 2030 by lifting business productivity*
- *Key 5G policy priorities include driving adoption and facilitating private sector investment through spectrum and infrastructure policy, especially for regional areas*

Specifically in relation to Infrastructure deployment, the report identifies that:

- *Coordinate clear and consistent policy across all communications-related issues at Federal, State and Territory level*
- *Facilitate reform opportunities outlined in AMTA's 5G Infrastructure Readiness Assessment report at the state & territory level, and progressing reforms to Carrier powers and immunities framework*
- *Government to consider incentives to encourage private investment in 5G services such as new funding arrangements or tax incentives to support greater 5G coverage into regional and remote areas*
- *Government should consult with industry on the need for further de-regulation with a view to removing out of date and inefficient regulatory requirements across the sector and seek to enable greater co-regulation<sup>5</sup>*

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<sup>4</sup> Local Government Association Tasmania (LGAT) Submission: 2021 Federal Regional Telecommunications Review, 30 September 2021

<sup>5</sup> 5G Unleashed: Realising the potential of the next generation of mobile technology, Deloitte Access Economics, Australian Mobile Telecommunications Association

The Report identifies that Delivery of 5G requires a commitment from all levels of Government. AMTA reviewed and assessed the current regulatory frameworks of each of Australia’s eight State and Territory Governments, and by extension local governments:

*Investment in 5G and delivery of improved speed, capacity and latency has the potential to support economic recovery, provide substantial benefits to business and consumers, enable remote work and education, support critical utilities and ultimately contribute to carbon reduction.*

*Australia’s state, territory and some local governments are increasingly turning to smart city or smart region strategies as a means to solve problems and improve the lives of their residents. 5G will increasingly become a technology that enables smart cities and smart regions.<sup>6</sup>*

Specific to Tasmania the report outlines the following findings:

#### *Best Practice Examples in Tasmania*

- Short statutory timeframes for processing of DAs for Telecommunications Facilities.
- Firm statutory timeframes for decision on 3<sup>rd</sup> Part Appeals to RMPAT.

#### *Reform Opportunities*

- Review acceptable heights in Single Planning Scheme Telco Code.
- Introduce complying development with additional facilities listed as ‘minor communications infrastructure in Tasmanian Planning Scheme.

*With planning well progressed for the continuing rapid deployment of 5G infrastructure across Australia, the time has never been better for Australia’s states and territories to review and recalibrate their policy settings and planning rules to cater for the demand for new 5G telecommunications network infrastructure. The rules and requirements need to be rewritten to reflect the ubiquitous and essential nature of the infrastructure to recast the balance in favour of timely and efficient deployment.*

*The ongoing application of the Telecommunications Code in the SPP could jeopardise approvals for augmentation of mobile network service in Tasmania (including 5G), and approval for mobile Blackspot towers, many of which are in rural areas and co-funded by Tasmanian State Government.<sup>7</sup>*

#### *2021 Regional Telecommunications Review - A step change in demand, 14 February 2022*

The Review found a digital shift has been taking place and is continuing, prompting a step change in demand. The Review emphasised the importance of reliable, modern, high-quality telecommunications to regional communities, particularly in light of COVID-19 and the increased data demands of working and studying from home.

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<sup>6</sup> AMTA State & Territory 5G Infrastructure Readiness Assessment First edition – March 2021

<sup>7</sup> AMTA State & Territory 5G Infrastructure Readiness Assessment First edition – March 2021

The findings and recommendations fall in four main areas:

- a more strategic, coordinated approach;
- more investment in digital infrastructure services and skills;
- better consumers support and information; and
- policy and regulatory change.

Improving mobile coverage and performance, as well as broadband and enhancing the resilience of telecommunications infrastructure to natural disasters, are key focuses of the report.

## 2022 SPP Review Framework

Submissions to the 2022 SPP Review are requested to consider five key questions. The MCF provide the following response to the five questions:

### *Which parts of the SPPs do you think work well?*

Relatively short statutory timeframes for processing of DAs for Telecommunications Facilities, particularly for permitted development.

Firm statutory timeframes for decision on 3rd Part Appeals to RMPAT.

### *Which parts of the SPPs do you think could be improved?*

1. C5 Telecommunications Code to provide for:
  - a. Acceptable Solutions (A1) provided for Facilities located within existing utility corridors or on sites with existing facilities.
  - b. Increased height limits for A2, to reflect previously accepted and standard heights for freestanding towers, particularly in the Rural, Industrial and Environmental Management Zones.
  - c. Additional acceptable solution for Telecommunications infrastructure funded or partly funded by State and Federal Government.
  - d. Review the Code purpose to reflect the increasing importance of telecommunications and digital connectivity positive to social, economic and cultural outcomes in Tasmania.
2. Additional Exemptions provided for in 4.2 Exempt infrastructure use or development.
  - a. Exemptions to be broadened particularly for minor infrastructure:
3. Restrictive Use classifications in various Zone provisions
  - a. The role of Telecommunications be recognised as essential infrastructure and that a Use for a Telecommunications Facility (which is subject to the Telecommunications Code) should be a permitted or no permit required Use in all Zones.
4. Recognition of high priority Government Funded Projects and apply appropriate exemptions and/or Acceptable Solutions specific to these projects.
5. Review the requirement for a Discretionary Permit for telecommunications facilities on Crown Reserve Land already subject to a rigorous Environmental Assessment Process (via the Department of Natural Resources and Environment Tasmania). This is essentially a double up of assessment and time (and cost) for development approval.

### Comment:

The *AMTA State & Territory 5G Infrastructure Readiness Assessment First edition* – March 2021, has done much of the work in assessing the current regulatory framework in Tasmania. It broadly reflects the above items identified for improvement and goes further with detailed assessment and commentary.



*AMTA is seeking the urgent attention of governments to rewrite their planning rules to ensure that they are consistent with best practice regulation found in the Leading Practice Model for Development Assessment, as well as non-discriminatory tenure rules consistent with the provisions of Telecommunications Act.*<sup>8</sup>

Specifically for Tasmania, it identifies 2 Key Recommendations:

***Recommendation 15 (TAS):***

*AMTA calls on the Tasmanian State Government and Minister for Planning to undertake a review of the Tasmanian Planning Schemes' Telecommunications Code, and in particular C5.6 Development Standards for Buildings and Works, to ensure that the acceptable solution for the height of structures strikes an appropriate balance between providing important mobile network services (including 5G) and protecting amenity.*<sup>9</sup>

***Recommendation 16 (TAS):***

*AMTA calls on the Minister for Planning to amend Clause 4.2.6 of the Tasmanian State Planning Provisions, with additions to the list of minor communications infrastructure that are exempt from requiring a permit. This should include:*

- a) the addition of antennas to an existing facility where the antennas do not exceed the dimensions of existing antennas and the overall height of that facility does not increase.*
- b) the establishment of a shelter or cabinet/s within an existing Telecommunications compound area*
- c) co-location of new 5G small cells onto existing utility poles within heritage areas.*

*In addition, Clause 4.2.6 could include several types of Telecommunications infrastructure that is currently not captured by the Telecommunications (Low-impact facilities) Determination 2018 but are exempt in States including Victoria or NSW*<sup>10</sup>

Currently under C5 Telecommunications Code, all Telecommunications Facilities outside of those contained in the Low Impact Facilities Determination 2018 (as amended 2021) and the Telecommunications Act 1997 require a Discretionary permit. This is a significant departure from many previous local interim Telecommunications Codes and has the effect of delaying and/or discouraging deployment.

Height limits within the C5 Telecommunications Code do not reflect existing predominant heights of towers (many previously considered acceptable under local interim schemes). This has the potential for poorer outcomes for coverage with significantly lower heights listed as acceptable. It creates a community perception that heights above acceptable solutions are inappropriate. Lower heights can discourage co-location as small structures cannot cater for as much equipment.

If future applications for Telecommunications Infrastructure fell into a permitted category (as a result of the 2022 SPP Review), Mobile Carriers consultation with local communities would still occur via "Industry Code C564:2020 Mobile Phone Base Station Deployment" (the "Deployment Code"), the exemptions proposed will not negate the need for the carriers to notify communities in an area around a proposed telecommunications facility, and then consider and respond to any feedback.

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<sup>8</sup> Pg 69 AMTA State & Territory 5G Infrastructure Readiness Assessment First edition – March 2021

<sup>9</sup> Pg 71 AMTA State & Territory 5G Infrastructure Readiness Assessment First edition – March 2021

<sup>10</sup> Pg 71 AMTA State & Territory 5G Infrastructure Readiness Assessment First edition – March 2021



### *What improvements do you think should be prioritised?*

The MCF strongly recommend a review and provision of a set of exempt facilities under Clause 4.2 Exempt Infrastructure. Advice on these exemptions has been previously provided in 2016, via the MCF's Submission on the Tasmanian Planning Scheme and Final Draft State Planning Provisions (as attached) and further refined under the *AMTA State & Territory 5G Infrastructure Readiness Assessment*.

Additionally, the *AMTA State & Territory 5G Infrastructure Readiness Assessment* provides a detailed assessment of reform opportunities in Tasmania and should be reviewed in conjunction with the SPP 2022 Review for Telecommunications under a **Stage 2 Detailed Review** process.

The provision of additional exemptions for Telecommunications infrastructure will bring Tasmania in line with other states and will assist to address the lagging digital inclusion index in Tasmania, and also recognise the social and economic benefits of the importance of reliable, modern, high-quality telecommunications. Undertaking a **Stage 2 Detailed Review** with Stakeholders such as Local and State Government, the MCF and Tasmanian communities should be prioritised so that the Key findings of the reports and publication listed above can be recognised, implemented, and correctly reflected within the SPP.

Digital Infrastructure and Inclusion is identified as a critical enabler to economic and social recovery for Tasmania. The SPP Policy review has the opportunity to take a proactive approach to apply improvements in knowledge and policy and in particular to facilitate reform opportunities outlined in *AMTA's 5G Infrastructure Readiness Assessment* report at the state level.

### *Are there any requirements that you don't think should be in the SPPs?*

These are covered in the sections above.

### *Are there additional requirements that you think should be included in the SPPs?*

The MCF highlights the need for further de-regulation with a view to removing out of date and inefficient regulatory requirements with the SPP that impact Telecommunications Deployment.

### *Are there any issues that have previously been raised on the SPPs that you agree with or disagree with?*

The MCF previously made submissions on the C5 Telecommunications Code in 2016. None of the suggested amendments were adopted or subject to further review. This submission is attached as it contains many relevant items, particularly in relation to expanding additional exempt facilities under Clause 4.2, and relevant commentary in relation to C5 Telecommunications Code.

### *Key Telecommunications Deployment Projects currently underway in Tasmania and subject to the Telecommunications Code (either C5 TPP or local interim specific Code)*

- Federal Regional Connectivity Program (Rounds 1 and 2)
- Federal Mobile Black Spot Program (Rounds 4 and 5)
- Carrier Specific 4G and 5G Deployment
- Tasmanian Government Radio Network (TasGRN) (Telstra are the Service Provider for the TasGRN, responsible for the design, build and management of the network)
  - 152 TasGRN Sites all requiring Planning approval (due to antenna size) despite only 19 new structures being proposed. 152 Planning Permits were required for this essential emergency services network. Whilst some applications were permitted under interim planning schemes, once the interim planning schemes are all replaced, all of these applications would be discretionary.

## Conclusion

The MCF has highlighted the importance of a regulatory framework that supports the provision of reliable mobile telecommunications infrastructure in Tasmania, including for the continued investment in upgraded and new networks, and to extend networks to fill mobile blackspots.

The MCF considers that there is a clear necessity to revise the Telecommunications Code within the SPP and add to the provisions that are permit exempt for telecommunication infrastructure developments that have a low or negligible impact.

In light of the significant research of the importance of Telecommunications Deployment, the MCF requests a **Stage 2 SPP Detailed Review** of the C5 Telecommunications Code and the TPS that will assist to achieve the key findings of the above-mentioned reports and Tasmanian and local Governments' own published findings on Digital Infrastructure and Inclusion.

Gaps and blackspots in mobile connectivity limit business and tourism. Connectivity is also critical in responding and recovering from natural disaster and other emergencies and in maintaining the safety of the community and visitors.

We thank you for your consideration of the matters raised in this submission.

Attached are Key Reference Documents to support this submission:

- Pages 55-58 of the *AMTA State & Territory 5G Infrastructure Readiness Assessment* First edition – March 2021, relating to Tasmania (**Attachment 1**)
- *MCF's Submission on the Tasmanian Planning Scheme and Final Draft State Planning Provisions*, 2016 (**Attachment 2**)

And links to Key referenced documents:

- *5G Unleashed: Realising the potential of the next generation of mobile technology*, Deloitte Access Economics, Australian Mobile Telecommunications Association 2022  
<https://amta.org.au/5g-unleashed-deloitte-access-economics/>
- *Federal 2021 Regional Telecommunications Review - A step change in demand*, 14 February 2022  
<https://www.infrastructure.gov.au/department/media/publications/2021-regional-telecommunications-review-step-change-demand>
- *Local Government Association of Tasmania (LGAT) submission on the 2021 Regional Telecommunications Review*, 30 September 2021  
<https://www.infrastructure.gov.au/sites/default/files/documents/rtr2021-submission-no-522-local-government-association-of-tasmania.pdf>
- *The Tasmanian Premier's Economic and Social Recovery Advisory Council (PESRAC) Final Report*, March 2021.  
<https://www.pesrac.tas.gov.au/reports>
- *AMTA State & Territory 5G Infrastructure Readiness Assessment First edition – March 2021*  
[https://amta.org.au/wp-content/uploads/2021/03/AMTA-5G-Readiness-Report-Summary\\_Final-Edition-No1-Date-23-02-21.pdf](https://amta.org.au/wp-content/uploads/2021/03/AMTA-5G-Readiness-Report-Summary_Final-Edition-No1-Date-23-02-21.pdf)

A Stage 2 SPP Detailed Review will be able to consider these documents in detail. The MCF will be able to provide further detailed case studies and examples to support the key improvements identified in this submission.