



Australian Mobile
Telecommunications
Association

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The Australian Mobile Telecommunications Association (AMTA) is the peak industry body of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians. AMTA members include mobile network operators, mobile network infrastructure providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

AMTA welcomes the opportunity to input into the Economic Reform Roundtable, in addition to the submission we provided to the Productivity Commission's 5 Pillars Review. Our response is focused on proposals for improving productivity and cutting red tape, together with building economic resilience and digital adoption. This will highlight the central role of mobile connectivity for productivity and economic resilience, the urgent need for regulatory burden reduction across spectrum licence fees, and the need to ensure a streamlined and nationally consistent planning regime for mobile deployment.

Mobile network digital infrastructure is a key enabler of productivity growth and vital to Australia's digital economy. Indeed, mobile connectivity was pivotal in facilitating the smooth transition to remote work during the COVID-19 pandemic, ensuring business continuity and economic resilience, while also contributing to public health and social well-being. For Australia to realise the productivity benefits of transformative technologies like AI, we require a foundation of secure, high capacity and reliable telecommunications connectivity which in turn requires ongoing investment. Digital applications and new technologies such as AI and cloud computing do not work without the latest upgrades to the underlying mobile technology and Australian businesses and consumers cannot benefit from these without connectivity. AMTA urges government to ensure that telecommunications policy settings encourage investment in new connectivity technologies for all Australians to benefit from digital applications.

Cut regulatory inefficiency and boost productivity

More efficient regulation will provide a better environment for investment, innovation and realising productivity benefits. Telecommunications carriers and carriage service providers in Australia are subject to more than 500 pieces of legislation and regulation. In 2024 alone, around 20 new sector specific regulatory requirements were introduced or in development. The cumulative impact and cost of regulatory burden is not one of enhanced business dynamism. The current approach to telecommunications regulation is fragmented, with multiple agencies pursuing siloed agendas. Compliance costs of new regulations are cumulative, and this needs to be offset by a process to review efficiency and effectiveness of existing regulation across different jurisdictions. Transparency around the regulatory landscape, particularly for spectrum allocation, spectrum pricing, and telecommunications infrastructure deployment is critical for the ongoing financial sustainability of the sector. As an initial step, key regulatory bodies (ACMA, ACCC, DITRDCSA, Home Affairs, etc) should be required to articulate a forward-looking program of all regulatory initiatives materially affecting the telecommunications sector, updated bi-annually. A working example of a similar such initiative is found in the Australian banking sector. This enhanced transparency of forthcoming changes to the telco regulatory landscape would enable a more efficient allocation of regulatory resources, minimise duplication and have a joint focus on outcomes between the sector, Government and regulators. This should be in addition to a review process which addresses regulatory inefficiency, duplication, and identifies opportunities to boost productivity.

Reduce spectrum licence fees and renewal fees

It is well documented that the mobile sector is under financial stress and that the Return on Invested Capital for the second and third placed mobile operator market participants is less than their Weighted Average Cost of Capital¹. At the same time, the industry continues to deliver enhanced value to consumers at the expense of revenue. Consumer Price Index (CPI) data for 2024 from the Australian Bureau of Statistics shows that Telecommunications Equipment and Services is the only economic sector where the CPI has declined. When compared to other sectors, telecommunications

¹ Venture Insights – State of the Australian Telecommunications Industry – June 2023.

declined by 23% between 2011 and 2024, compared to increases of 70% and 60% for electricity and utilities respectively.

Since 2020, mobile network data traffic has increased by almost 400 percent² requiring operators to further invest in network capacity without corresponding price increases levied on consumers. It is also well understood that costs paid for spectrum and capital spent on spectrum licences reduces the ability of mobile network operators (MNOs) to invest in, and improve, service outcomes such as speed, reliability and latency, or provide differentiated connectivity. Prices paid for spectrum can in turn impact productivity and economic resilience. Mobile networks require ongoing investment to support technology upgrades and digital applications. In 2022, Deloitte Access Economics estimated a \$27bn (AUD) incremental benefit to economic growth if Australia accelerated adoption of advanced 5G by 2030. Ensuring spectrum licence renewal fees are minimised so that MNOs can focus scarce capital on deployment and upgrades is critical to enhance national productivity and adopt digital applications.

Between 2028 and 2032, 80% of spectrum licences will expire. The ACMA's preliminary view is that these licences should be renewed to provide continuity of service for mobile users and to ensure continued investment in the networks that use the spectrum. The ACMA has undertaken a benchmarking process and found that spectrum prices around the globe have decreased in value by 39% in the last seven years and is looking to apply these reductions to the spectrum licence renewal pricing. However, further price reductions are expected between now and when the licences renew, which the ACMA's model does not consider. Within this period, more spectrum will be made available to MNOs to meet demand. This additional spectrum value and cost burden has not been accounted for in the ACMA's modelling³. The mobile industry seeks a further 50% adjustment to pricing to cater for these future circumstances. The sector should also be enabled to pay for any spectrum licences through instalments so that costs associated with the spectrum asset better align with the revenue generated by the asset.

Harmonise and streamline network deployment obligations across jurisdictions in the national interest

A key area constraining efficient network deployment (and introducing significant costs and delays) is infrastructure planning and the lack of harmonisation across federal, state and local governments. With eight State and Territory Governments and 537 Councils in Australia, there is a patchwork of rules in planning schemes and processes that are wholly inconsistent, inefficient and which require significant time and financial resources to navigate. Rules for network deployment are in urgent need of redrafting and modernisation to reflect the ubiquitous and essential nature of the infrastructure requirements for digital connectivity. This will serve to recast the balance in favour of timely and efficient deployment, noting that this needs to be achieved without detriment to the environment and amenity.

Over the last 5 years, AMTA has developed and highlighted specific examples of regulatory best practice in Australia's State and Territory Planning systems that have reduced the regulatory burden for our industry, and that have ultimately delivered improved service, whilst protecting the environment. These initiatives can be found in the [2021 AMTA 5G State and Territory Readiness Assessment](#), and [AMTA's Model Framework for State and Territory reform](#).

More recently, to progress the reform agenda AMTA has convened an industry working group consisting of mobile carrier members and other interested stakeholders to formulate a proposal to modernise Schedule 3, 'Powers and Immunities' of the Telecommunications Act 1997. The Government needs to urgently review and amend this part of the Act to allow for the more efficient deployment of critical mobile infrastructure within Australia.

Mobile infrastructure is increasingly considered critical infrastructure, particularly in times of natural disaster. Importantly, the industry is not provided with the same access rights and exemptions from planning as other utilities, creating an asymmetrical regulatory burden on the MNOs compared with other utility providers. There is a pressing need for government to recognise and address this planning asymmetry.

In addition to amendments to Federal legislation, the rules and terms of access to Crown land for deployment of critical network infrastructure presents a significant constraint. Telecommunications carriers are often treated differently to other critical infrastructure providers when seeking to use public roads and land, in that little or no rent is often charged to electricity, water and other traditional utilities. In contrast, telecommunications carriers are confronted with discriminatory commercial pricing and terms. ATMA urges government to apply consistent access criteria across all utilities.

² Ericsson Mobility Report 2025.

³ ACMA consultation on [Expiring spectrum licences \(stage 3\)](#) papers and AMTA submission

Any queries in relation to our submission please contact Louise Bradford, AMTA Head of Policy
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