

Briefing note on CommsConnect speech

Speech details	CommsConnect conference From 11.15-11.45 (25 mins and 5 mins for Q&A)
Location	15-16 October 2025 Melbourne Convention and Exhibition Centre
AMTA topic	Australia's competitive digital future depends on affordable access to spectrum.
Word count	3057

Introduction

Good morning, Ladies and Gentlemen, it is a pleasure to be here at Comms Connect. Thank you [Geoff] for the lovely introduction and the opportunity to speak today.

I wish to acknowledge the Wurundjeri (whir-un-jerry) people of the Kulin (coo-lin) nation as traditional custodians of the land on which we are meeting today. I pay my respects to elders past and present and recognise any first nations people present.

I also wish to acknowledge colleagues and representatives from industry and government here today.

The Australian Mobile Telecommunications Association, commonly known as AMTA, is the peak industry body representing Australia's mobile telecommunications industry.

For 30 years we have been the voice representing mobile network operators and service providers, mobile phone and device manufacturers, retail outlets, network equipment suppliers and other suppliers to the industry.

Over this period, we have witnessed many key developments. From the earliest mobile networks to the NBN; the rise and fall of providers like One Tel and Orange; the first phones which needed a suitcase battery to the indestructible Nokia 3310 and now to today's smart phones which allow us to store our entire lives in our pockets.

Communications, and telecommunications networks in particular, have never been more important than they are right now.

In a world where mobile networks, AI, economic productivity, geopolitical instability and sovereign risk are increasingly intertwined, the health and resilience of our domestic mobile telecommunications network assets, and more broadly, the sustainability of the sector, is a critical and strategic factor in this changing landscape.

OPTIONAL

I'd like to do a quick survey... for those that are able to... please put your hands up if you had a landline at home back in the early 2000s.

And please keep your hand up if you still have a landline at home...

If substantial difference: Thank you for helping me show exactly why telecommunications and mobile networks are so vital to keeping Australians connected.

If most people have a landline still: Well, I am glad that there are plenty of communications professionals are still holding on to a landline, sadly, we are now in the minority.

Australians are more reliant than ever on mobile technology. According to the Australian Media and Communications Authority, in 2015, 29 per cent of us only had a mobile for calls at home, and no personal landline. By 2022, landline free homes

more than doubled, with 63 per cent of us only having our mobile phones at home. Having access to sufficient spectrum is critical to the delivery of these mobile services.

If you take one thing away from my speech today, it should be this. Australia's digital future absolutely relies on affordable access to spectrum, and we must protect it.

Our future economic prosperity is directly linked to the ability for Australia to realise the productivity benefits of transformative digital technologies like AI.

Telecommunications enables this AI to seamlessly integrate in all sectors – from medicine to sports and civil engineering – enhancing our efficiency and productivity.

To deliver this requires us to have a foundation of future ready, secure, and reliable telecommunications connectivity. Reliable connectivity requires ongoing planning and investment in digital infrastructure assets and capability, a financially sustainable sector, and a supportive regulatory environment.

I believe there are **three key opportunities** to enhance the sustainability of the mobile sector.

First, industry requires access to sufficient quality spectrum that meets consumers' demands for data and which is priced in a manner that supports sustainable investment and a competitive mobile sector.

Secondly, we must place the cumulative impact of regulatory burden at the centre of any future policy and regulatory decision making to address what the Productivity Commissioner, Danielle Wood, has referred to as “regulatory hairballs” that have found their way into almost every corner of our economy.

Finally, planning and deployment regulation should be harmonised across federal, state and local jurisdictions, to ease the regulatory burden of duplicative and inconsistent regulation in our sector in favour of a consistent, balanced and effective planning framework for mobile infrastructure deployment.

These opportunities will help Australians to realise the productivity benefits of transformative digital technologies, and for the sector to better meet the massive demand for secure and resilient digital infrastructure assets now and into the future.

Let’s look at our first priority – affordable spectrum.

Spectrum is our invisible highway in the air for delivering reliable and expanded mobile coverage, including via satellite. Spectrum is a very scarce resource and it’s a vital component to deliver mobile services to Australians. We must manage it carefully if we are to build a more connected and capable future for our nation.

Spectrum has different lanes or ‘bands’ that are used to deliver a range of services Australians rely on every day – from making phone calls and streaming content to accessing emergency services and running small businesses. Each lane has

limitations, and these lanes are generally licensed from the Government for periods of about 20 years.

The mobile industry makes significant long-term investments in the mobile networks that run on this spectrum, and certainty of access is critical for the telecommunications industry to continue to innovate and improve services.

The price of spectrum is also a key factor impacting the financial sustainability of the sector. In short, spectrum costs and the way spectrum is priced impact future investment, industry sustainability and ultimately, the prices consumers pay for their services.

The amount of spectrum required to support consumers' insatiable demands for data, and the ability to attract investment to support this, is a challenge for industry. In 2025, Australia's total mobile data downloads are projected to reach approximately **5.7 exabytes (EB)** for the year (that is 1 billion gigabytes)¹. This is estimated based on figures of 34.4 million mobile connections and an average monthly mobile data usage per user of 14.2GB.

This demand cannot be met without additional and affordable spectrum.

¹ <https://datareportal.com/reports/digital-2025-australia>.

AMTA is advocating for upper 6 GHz spectrum before 2030, and a second digital dividend of 80MHz of 600 MHz spectrum. The upper 6 GHz is needed to meet the demand for mobile data in cities and the 600 MHz to provide capacity relief in regional and rural areas.

The cost of spectrum is a huge consideration. Just as the price of eggs determines how much a cafe might charge you for breakfast, there is a direct relationship between the price paid for spectrum and the price paid by consumers for mobile services.

The Australian Communications and Media Authority (ACMA) is currently undergoing a process for Expiring Spectrum Licences (or ESL) – relating to the renewal of approximately 80 per cent of the low and mid band mobile spectrum licences expiring between 2028 and 2032.

AMTA welcomed the outcome of the expiring spectrum licences process in June which concluded that renewal of licences held by network operators best serves the public interest. This is of critical importance to mobile operators for service continuity and investment certainty. While we are encouraged by the process the regulator has undertaken to date, we remain vigilant about the need to ensure spectrum is priced in a manner which incentivises continued investment and innovation.

Renewing spectrum licences at affordable rates ensures ongoing value to consumers. These licences are for the spectrum that is already being used to

provide critical services to millions of Australians, right now. It supports emergency communications, rural broadband and digital transactions.

When operators face uncertainty about which spectrum they'll retain, long-term planning stalls.

In Australia, spectrum licences are due for renewal over the next eight years.

If it is decided to auction that spectrum to the highest bidder, it would have a chilling effect on investment.

It is not scaremongering to predict capital expenditure would be deferred. Strategic partnerships would be put on hold and everyone from equipment vendors to application developers would be left in limbo as a result. With the Olympics set for 2030 and investment in infrastructure on hold, Australia risks falling seriously behind exactly at the wrong time.

Re-auctioning spectrum also runs the risk of forcing network operators to reconfigure networks due to changes in the individual allocation each operator has, even if the quantity of spectrum they have remains the same. The topology and design of radio access networks, including the geographic location of base stations and their proximity to other base stations, the antenna types and even the radio transmitters the operators purchase from their vendors, is done based on the specific frequency ranges each operator holds. That includes NBN.

This disruption is not theoretical. Changes in spectrum holdings affect everything from cell site planning to device compatibility and network optimisation. The ripple effects could be felt across rural coverage, urban capacity, and emerging technologies like satellite-to-mobile and 6G. And any network changes forced by changes in spectrum holdings come at a cost. Sites must be redesigned, and new equipment such as radio filters, antennas and even the radios themselves may need to be changed. This could run into billions of dollars across the industry, and this increased cost will be passed onto consumers, and not in any way benefitting taxpayers.

We must ensure that our spectrum management framework supports mobile service continuity, predictability, and affordability.

Secondly, it is no secret that the mobile sector has experienced long-term declines in returns on invested capital. Mobile sector capital expenditure has remained constant at around \$5.4 billion each year for the years 2019-2023, despite operating profits decreasing by 24 per cent over the same period.² With long term declines in revenue, industry return on invested capital for some is now below the weighted average cost of capital, creating the real prospect of a “digital investment gap”.³

² JPMorgan Australian Telecommunications Analyst note, 4 Oct 2023.

³ Venture Insights State of the Australian Telecommunications Industry, 13 June 2023.

At the same time, the mobile industry is arguably delivering benefits to consumers in terms of cost and price – far more than any other sector. According to the ABS Consumer Price Index data for December 2024, the Telecommunications equipment and services sub-category is the only major cost category to have reduced in real terms over the past decade with a decrease of nearly 24 per cent since June 2012. This compares to increases of approx. 70 per cent and 60 per cent respectively for electricity and utilities. Overall CPI increased by 40.14 per cent over the same period. And to put that in even greater context, the cost of housing rose by over 50 per cent over this period. But this infrastructure must be paid for, and if spectrum becomes less affordable, the hard costs associated with preserving that asset means there is less money which can continue to prop up infrastructure needs.

Another very real cost is the more than 500 pieces of legislation and regulation that operators must comply with. In 2024 alone, around 20 new sector specific regulatory requirements were introduced or in development.

There is consensus that reform is long overdue in the telecommunications industry including from AMTA.

In relation to regulatory reform more generally, the Assistant Minister for Productivity, the Hon. Dr Andrew Leigh, and the Minister for Housing, the Hon. Claire O’Neil, have both separately called for the slashing of “thickets of regulation” and the dismantling of red tape and regulatory barriers.

Better coordination, visibility, and sequencing across different levels of government and multiple regulators is needed so that financial impacts may be considered and quantified in a more holistic way.

AMTA considers there is opportunity to look at how some of the legislative burden could be sensibly reduced. Getting rid of these regulatory ‘hairballs’ would save time, effort and money, which could then be directed back to bolstering infrastructure and essential services.

The **third opportunity** to ensure affordable spectrum and a competitive, sustainable industry is better collaboration with government across federal, state and local levels.

Digital infrastructure is often cited as critical, particularly in times of natural disaster. Yet importantly, the industry is not provided with the same access rights and exemptions from planning as other utilities. This creates asymmetry in terms of the regulatory burden on mobile network operators compared with other providers - and it's really, really, expensive.

The lack of harmonisation impacts everything. It creates unnecessary planning roadblocks, delays our ability to meet the growing demand for data and connectivity and means we don't have the infrastructure to manage increased loads well.

Navigating a complex and inconsistent maze of planning, development and environmental approval processes across eight States and Territories and 537 councils is costly, inefficient and leads to significant delays.

We see **two clear key reform opportunities**:

The first is to gain agreement between States and Territories to align and coordinate amendments to planning arrangements. AMTA has provided a blueprint for such an approach with our 2023 AMTA **Model Framework for State and Territory reform**. **If you are not familiar with it**, the Model Framework identifies best practice for streamlined and consistent planning across the various jurisdictions.

The second is Commonwealth legislative reform – namely, amendments to Schedule 3 of the *Telecommunications Act 1997* to provide streamlined pathways for mobile telecommunications towers that are low impact.

AMTA recently kick-started an initiative to develop an industry view on key priorities for telecommunications legislative reform at a national level. This involves bringing together our mobile operator members and several Mobile Network Infrastructure Providers to discuss potential amendments to Schedule 3 of the Telecommunications Act as well as any flow-on amendments to other instruments.

We know that industry consensus is vital, and AMTA is pleased to lead this initiative, bringing a united voice for the telco industry, to achieve regulatory reform, as we have done consistently with the support of our members.

In addition to leading advocacy for these broader reform initiatives, AMTA has also engaged directly with State governments to streamline planning approvals through incremental reform. In NSW, this has led to exemptions from the need for development approval for new towers in rural areas. In Victoria, there are planning exemptions from government funded mobile towers. Most recently, in the Northern Territory, reforms like those in NSW allow mobile infrastructure to bypass the Territory's development approval process in several zones. These reforms took AMTA several years to achieve.

AMTA members are now working to expand mobile network infrastructure in regions like Queensland and Western Australia. However, outdated and discretionary planning provisions hinder these efforts by imposing complex approval processes. Recognising mobile infrastructure as critical infrastructure within state planning policies is essential to streamline deployment and enhance connectivity and is something on which we will continue to advocate.

Triple Zero Incidents and Emergency Calling

It would be remiss of me to be here with you today and not talk about something else

of incredible importance to our industry - the recent Triple Zero incidents.

I acknowledge that there are many people in our audience today who either work in or with the emergency services and I thank you for the care you bring to Australians every day.

As many of you may know, there are currently two investigations underway into some recent Triple Zero incidents. It is important to let those investigations take their course and for the findings and appropriate recommendations to be made.

Last week, the CEOs of the three mobile network operators - Optus, Telstra, and TPG Telecom - had a constructive meeting with the Federal Minister for Communications, the Hon. Anika Wells, to discuss the reliability of the end-to-end Triple Zero system, the resilience of the telecommunications networks and natural disaster preparations.

Australians need to be able to trust that calls to Triple Zero will work when it matters most, and the network operators take that responsibility seriously.

The industry supports ongoing collaboration with the Government to strengthen Triple Zero, improve real-time network information sharing, and enhance emergency response coordination to the highest standards.

While no network is infallible and outages sometimes occur due to factors that cannot be controlled, we must focus on minimising the risk of disruption and responding swiftly when issues arise.

This also speaks to why it is so important for our digital future that investment in infrastructure for the long term can continue. That is also why we are working closely with Government, emergency services, regulators, and industry partners to advocate for affordable spectrum being a key part of Australia's future.

There is no doubt in my mind that Australia's digital future relies on access to affordable spectrum.

Over the winter, AMTA launched the first part of our Future of Mobile series – commissioning research which shows the impacts of mobile telecommunications for the nation.

Our first piece showed what was possible in Australia by 2030 with Deloitte examining key industries like healthcare, sports and construction and predicting future trends. They found the use of AI, smart wearable tech devices like glasses, rings and watches, and digital processing powers were going to reduce some of the difficulties of life many of us take as a given. For some of you, I'm sure you'll be

pleased to hear that our research shows we will be able to completely rid ourselves of things like wallets, keys and tickets if people choose – because everything will be able to be stored on our phones.

But none of this will be possible in Australia if mobile network operators don't have access to affordable spectrum. If we don't have affordable spectrum, it affects investment, infrastructure, and, most importantly, connection. If spectrum is auctioned off to the highest bidder, at a minimum, plan prices will go up.

We already know people are doing it tough. We want people to easily maintain the ability to affordably connect with their loved ones and with the world around them.

That connection means more than anything, but if the price on spectrum is too high it will become something that is passed on to consumers.

I urge you all to join our push to keep spectrum affordable, and keep Australia's digital future in safe hands.

If you'd like to learn more, please do send me a request to connect on LinkedIn or follow AMTA on social media.

Thank you very much for having me today.