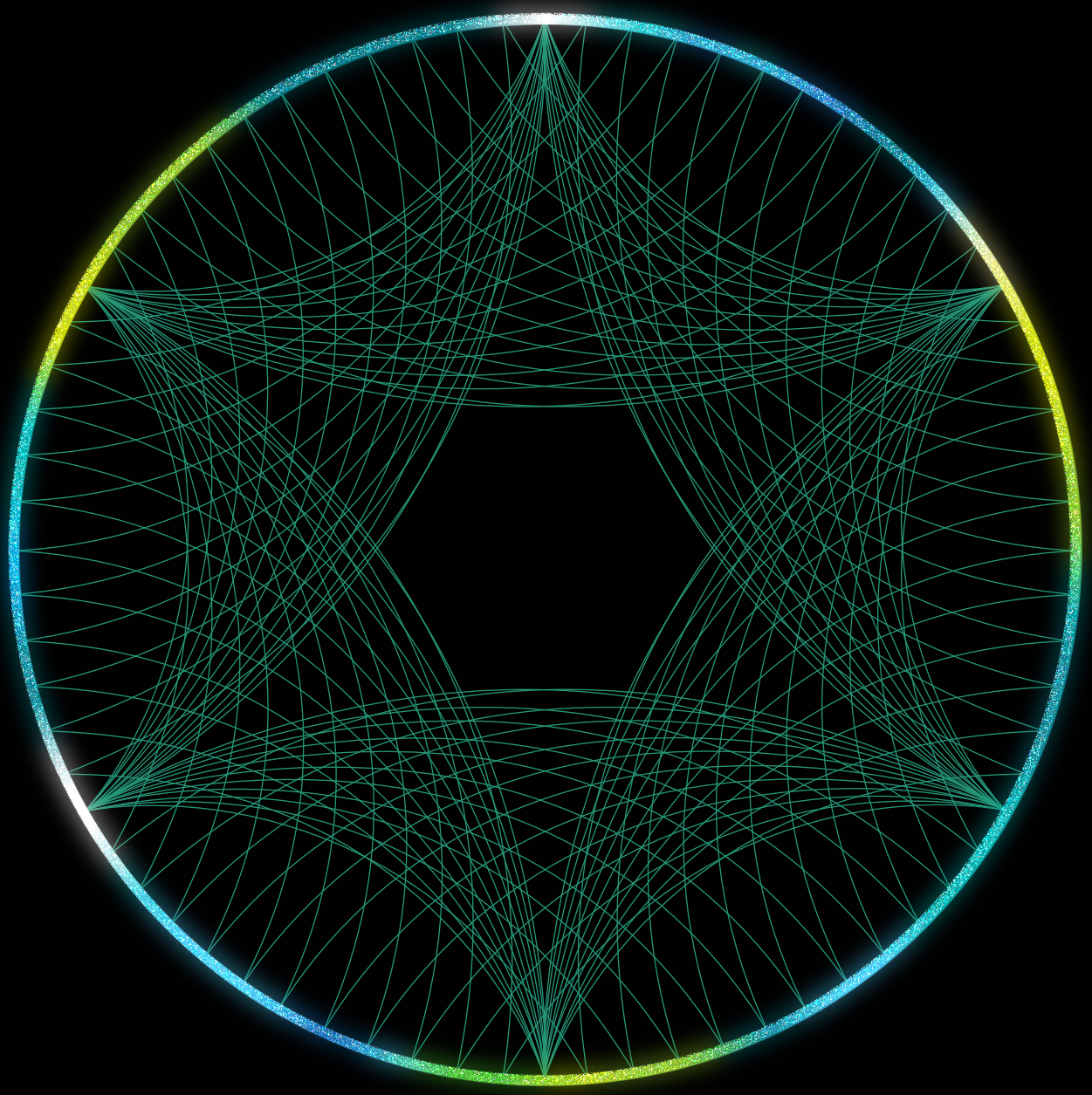
Deloitte.



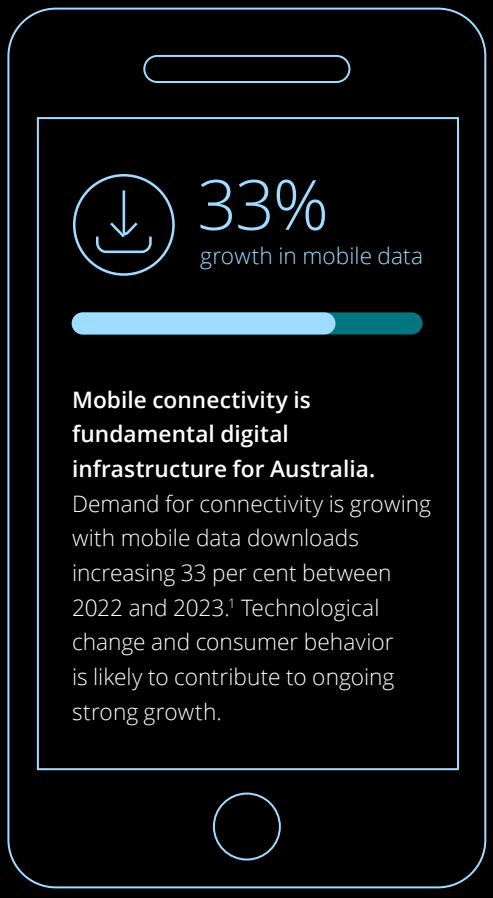
Future of Mobile:
Reforms to modernise Australia's telecommunications

Australian Mobile Telecommunications Association

March 2026

Deloitte
Access Economics

Executive summary

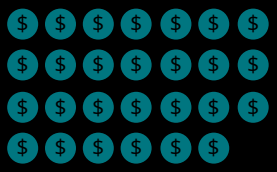


Mobile connectivity is fundamental digital infrastructure for Australia. Demand for connectivity is growing with mobile data downloads increasing 33 per cent between 2022 and 2023.[1] Technological change and consumer behavior is likely to contribute to ongoing strong growth.

Executive summary

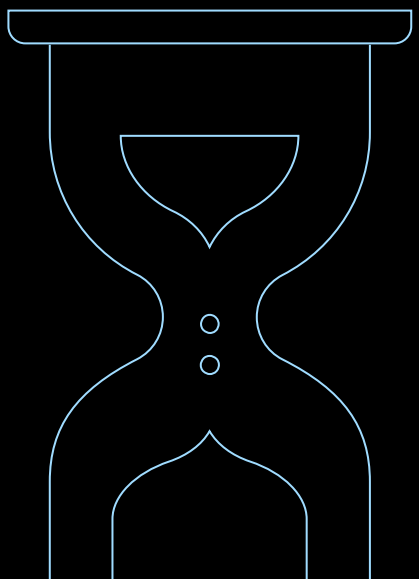
Telecommunications is the critical engine of Australia's modern economy

$27 billion

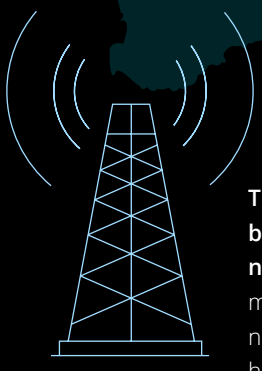


Improving Australia's mobile connectivity is an economic imperative. Modelling undertaken in 2022 shows that being a global leader in advanced mobile connectivity would deliver an additional $27 billion in productivity benefits to Australia through to the end of the decade.[2]

Infrastructure is held back by a fragmented regulatory environment across federal, state and local jurisdictions. A lack of consistent and cohesive planning contributes to the time to secure development approval for a new telecommunications facility being an average of approximately 211 days.[3]



Australia lacks the long-term spectrum planning undertaken by global peers such as the US, UK, and EU. Long-term strategic planning is needed now to ensure Australia stays at the forefront of technological innovation and meets needs in regional and rural areas.



The cost of delay is no longer just a business inconvenience but a risk to national resilience. Telecommunications must be elevated as the third pillar of national infrastructure reform alongside housing and energy.

Executive summary

There is consensus that mobile planning reform is needed and that now is the time to boost productivity through enhanced regulatory consistency.

The Commonwealth Government sought productivity ideas in 2025; prioritising "harnessing data and digital technology" in its national agenda.

Successive national reviews consistently call for streamlined, nationally consistent planning and faster approvals for mobile infrastructure.

Clear strategy and reform are now essential to ensure deployment keeps pace with future requirements so Australia can remain a technology leader.

Streamlining planning removes duplication and delays, encouraging investment and accelerating new technology adoption.

There are six opportunities that will help deliver mobile infrastructure more quickly and efficiently in the places Australia needs it.

Immediate opportunities

1 **Establish a Digital Infrastructure Coordinator General**

A national body to centralise expertise, coordinate government efforts, and drive national telecommunications reform.

2 **Create a harmonised planning framework with adoption incentives**

A national planning framework with clear criteria, supported by time-bound incentives to drive council uptake.

3 **Amend Schedule 3 of the Act* to adopt a risk-based approach**

Update Schedule 3 with a risk-based approach: expand low-impact definitions, apply proportionate obligations, and retain safeguards for high-risk work.

Long-term reforms

4 **Develop a National Spectrum Strategy**

A strategy to provide investment certainty, drive efficient allocation, and secure Australia's future digital technology and economic leadership.

5 **Create planning and land access exemptions for government co-funded sites**

Create targeted planning exemptions for government co-investment sites and establish a government last-resort mechanism for land access.

6 **Implement a process for streamlining the Act* over time**

Implement an industry-led process to streamline the Telecommunications Act, using risk and cost-benefit analysis to guide amendments and boost productivity.

*The Act refers to the Telecommunications Act 1997 (Cth)

Modernising telecommunications regulation means a more connected Australia, more investment and a network ready for next-gen mobile

25%
reduction in approval timeframes

150 – 200 accelerated sites each year delivering new or upgraded mobile coverage to up to 250,000 Australians sooner

... bringing forward up to $160 million worth of connectivity improvements

10%
reduction in regulatory complexity through national consistency

$150 million in annual productivity gains, freeing up resources for innovation, improving consumer outcomes and businesses' financial sustainability

10%
improvement in regulatory practices

4 per cent annual increase in telecommunications investment each year

... equivalent to $430 million in additional investment in mobile infrastructure rollout

Contents

Glossary

Acronym	Term
ACCC	Australian Competition and Consumer Commission
ACMA	Australian Communications and Media Authority
AMTA	Australian Mobile Telecommunications Association
DICG	Digital Infrastructure Coordinator General
DITRDCSA	Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
FCC	Federal Communications Commission US
IoT	Internet-of-things
IFD	Investor Front Door
MBSP	Mobile Black Spot Program
MTWG	Mobile Telecommunications Working Group
NTIA	National Telecommunications and Information Administration US
PUMP	Peri-Urban Mobile Program
TIND	Telecommunications in New Developments
VCAT	Victorian Civil and Administrative Tribunal

01
Introduction

1.1 Introduction

Now is the time to elevate telecommunications as a national priority

Mobile telecommunications is an essential enabler of the modern economy

Australia relies on over 30 million mobile subscriptions with nearly all Australians (95%) using a mobile phone to go online.[1] Intensity of use has increased substantially with the volume of mobile data downloaded increasing 33 per cent in 2023 alone.[2]

The reach and growth of mobile connectivity highlights the need to ensure settings are sufficient to deliver the infrastructure required to maintain and improve service quality and digital inclusion across Australia. There is an economic imperative for getting mobile planning right. Deloitte Access Economic modelling from 2022 finds that being a global leader in advanced mobile connectivity would deliver an additional $27 billion in productivity benefits to Australia through to the end of the decade.[3] This may underestimate the impact given the growing role of mobile in productivity-enhancing AI technologies.

Mobile connectivity is more central to daily life as technological change increasingly reshapes how Australian consumers and businesses access services, interact with government and participate in the economy. Mobile networks will also continue to increasingly enable the use of AI. For example, the share of AI-capable smartphones is expected to reach more than 50 per cent by 2028, creating the potential for a step-change in the volume, speed and reliability of connectivity required across the economy.[4]

Mobile connectivity also plays an essential role in regional and remote Australia. Today's mobile services are important for equitable access to health, education and community services, as well as for boosting economic inclusion and productivity in regional and remote Australia. However, tackling uneven digital infrastructure provision across Australia requires ongoing investment in improved and expanded infrastructure and services.

The regulation of the telecommunications sector plays a critical role in realising these social benefits, as well as safeguarding public safety, security and cyber resilience. At the same time, it is important to distinguish between regulation that is necessary to achieve these core objectives and requirements that slow infrastructure deployment and add compliance burden without delivering commensurate public benefit.

Getting the balance of policy settings right is essential for realising the economic benefits that mobile telecommunication currently supports, improving the wellbeing and long-term living standards of Australians.

This report's approach to identifying regulatory priorities

This report outlines a pragmatic case for change as part of AMTA's Future of Mobile campaign.

The recommendations are based on Deloitte Access Economics' assessment of regulatory opportunities within telecommunications to help enhance productivity in the sector. They have been developed in collaboration with AMTA's members and through consultation with policy makers.

This report does not seek to undertake a full cost-benefits analysis of the recommendations. However, in selecting the reforms, the feasibility, implementation and learnings from Australian and global best practice have been considered.

The proposals offer both immediate opportunities and long-term solutions. They are targeted at improving outcomes for Australians by reducing the cost of deploying new infrastructure, increasing investment certainty and enhancing accountability and consistency in digital infrastructure delivery.

Indicative benefits are presented in the report based on experiences in other countries, comparable reforms in other jurisdictions and existing timelines for the approval for telecommunications infrastructure across Australia. Data and insights on planning approval timeframes have been provided by AMTA in the preparation of this report have not been independently verified (see Appendix 1 for more details on methodology).

The recommendations presented should be considered a starting point for government and industry collaboration – they are not a comprehensive list, and further work will be required through implementation.

Modernising Australia's telecommunications framework should be a national priority

Telecommunications reform should be a national priority sitting alongside the reforms to housing and environmental approvals identified as key actions at the August 2025 Productivity Roundtable.

The current regulatory environment is complex and growing. Carriers and infrastructure providers face hundreds of regulations that, in places, impose a disproportionate burden slowing investment, infrastructure deployment and innovation.

Inconsistent and restrictive planning frameworks across states and territories create major roadblocks and delays. This slows the delivery of connecting communities.[5] One example includes the Sunshine Coast—a region among the top five in Australia for complaints to the Telecommunications Industry Ombudsman—where planning controls on setback, facility separation and location restrictions make it highly challenging to find compliant sites near populated areas.[6]

—

"cutting red tape…to ease the burden on businesses and consumers"

The Hon Dr Jim Chalmers MP, Treasurer, on the Government's reform priorities[7]

Streamlining planning rules, ensuring best practice and moving towards a harmonised national approach across states and territories are objectives that would help enable faster infrastructure deployment at lower cost. This would deliver benefits to both industry and consumers.[8]

In another example, in Western Australia, gaps in strategic infrastructure planning have resulted in significant delays to new towers being connected to power. This includes at federally funded blackspot sites in places like Meeking, Strathearn and Gooley where power connection timeframes approached or exceeded 600 days.[9]

There is consensus reform is needed

Prioritising telecommunications reform aligns with the Commonwealth Government's objective to raise productivity and with commitments from the Productivity Roundtable to work with states and territories to accelerate delivery of planning, zoning, approvals and investment in enabling infrastructure. The actions set out in this report directly support these national goals.[10]

There is already a clear consensus for reform with successive national reviews (e.g., *Regional Telecommunications Review, Regional Mobile Infrastructure Inquiry* and *Connecting the country: Mission critical*), calling for streamlined planning and faster approvals.[11, 12, 13] In 2024, the Mobile Telecommunications Working Group (MTWG) delivered national principles for planning reform. These principles were endorsed by Commonwealth, State, and Territory Ministers, providing a ready framework for consistent implementation.[14]

The consensus is also evident in the expansion of the Telecommunications in New Developments (TIND) Policy which requires developers to consider mobile connectivity as part of the overall development application process, with a similar level of importance as other utilities. This recognises that integrating reliable mobile coverage into planning and design is essential for inclusion, opportunity and public safety.[15]

Why now?

The time for telecommunications reform is now. We have the evidence and endorsed national principles to act. This foundation enables rapid, coordinated reform, not piecemeal changes.

Streamlining planning will remove needless delays and duplication. It will encourage private investment and lower network deployment costs. This benefits both cities and regional Australia.

Demand for connectivity is rising. A national framework is ready, and the need for sufficient spectrum is pressing. Prioritising reform now will deliver faster deployment and stronger investment. This means better outcomes for communities and businesses.

1.2 The case for change

A broad evidence base highlights the meaningful benefits to be gained

What reform is needed?

This report sets out three immediate opportunities and three longer-term reforms to modernise Australia's telecommunication framework. Theses reforms will advance a number of key outcomes including:

- Helping to accelerate the deployment of critical telecommunication infrastructure by removing roadblocks at odds with community interest, closing coverage gaps and improving quality across the nation.
- Unlocking industry investment and productivity through improved coordination, transparency and the sensible streamlining of planning and approvals.
- Ensuring that Australia's digital infrastructure is prepared for the future through better long-term planning.

Targeting these outcomes will contribute to a range of economic and social benefits outlined in the following sections.

Benefit: Accelerating deployment of critical telecommunications infrastructure

Telecommunications infrastructure deployment is crucial to keeping pace with growing demand and closing coverage gaps —particularly in regional and disaster-prone areas. However, fragmented planning rules across more than 500 instruments are contributing to approval timeframes of over six months for some mobile sites, slowing network rollout and raising costs.[16]

Reforms in Australia and overseas have contributed to cutting approvals times by a significant degree. For example, a 50 per cent reduction in planning timeframe for compliant, low-impact facilities is consistent with the experience under New South Wales' complying development pathway and represents a credible national benchmark.[17]

In the United States, coordination through the Federal Permitting Improvement Steering Council reduced average environmental assessment timeframes from around 4.5 years to 2.5 years, a reduction of roughly 45 per cent.[18]

Even a conservative estimate of a 25 per cent decrease in approval timeframes would see 150 to 200 mobile sites delivered sooner each year. This is equivalent to between $120 million and $160 million worth of connectivity improvements delivered earlier, providing new or upgraded coverage to between 180,000 and 250,000 sooner.[19, 20, 21]

Quicker network deployment doesn't only improve consumers' ability to connect; it enables their productivity, access to services, and digital participation sooner (e.g., telehealth, banking, education, remote work, small business operations).

—

"It is critical that a country as vast as Australia prioritises connectivity regardless of postcode"

The Hon Anika Wells MP, Communications Minister

Coverage gaps intersect directly with disaster risk. Around 5.4 million square kilometres of Australia currently have no mobile service, and 5.9 million Australians live in priority zones requiring enhanced disaster resilience.[22] In these areas, complex planning and investment settings compound existing blackspots. During Severe Tropical Cyclone Seroja, 186 base stations were destroyed, leaving thousands of properties without communications and underscoring the human consequences of limited coverage redundancy in high-risk regions.[23]

Faster and more flexible planning can build resilience and provide higher quality connectivity across the nation. For example, following harmonisation under the United Kingdom's Wireless Infrastructure Strategy, the United Kingdom met its "basic 5G" population coverage target five years ahead of schedule. The key UK policy allowing for faster planning is deemed consent. This helps remove bottlenecks by seeing applications automatically approved if councils do not respond within 56 days. Standalone 5G now covers around 83 per cent of the country.[24, 25]

Benefit: Unlocking industry investment and productivity

The telecommunication industry currently invests $9.74 billion annually on infrastructure that supports communities.[26] However, sensible and targeted changes to modernising Australia's approach to regulating the sector are vital to create the right environment for the high levels of ongoing infrastructure investment Australia needs. This could be achieved by improving consistency across jurisdictions, implementing established best-practice and removing needless duplication.

International evidence demonstrates that a 10 per cent improvement in regulatory practice is associated with a 4 per cent uplift in telecommunications investment. Based on current industry spending levels, that equates to approximately $430 million annually of industry investment contingent on legislative reform.[27]

—

"Telco companies are also at the vanguard investing in AI as a technology that promises more efficient networks."

ACMA Chair, Nerida O'Loughlin PSM

Modernising telecommunications regulation would also improve productivity in the sector. Nationally, the burden of regulatory complexity is estimated at $160 billion per year.[28] Proportionate to the economic activity generated by the telecommunications sector, its share is approximately $1.5 billion annually. By consolidating duplicative rules and improving national consistency, a conservative 10 per cent reduction in regulatory complexity could unlock around $150 million in annual productivity gains, freeing up resources for innovation, and improved consumer outcomes and businesses' financial sustainability.[29, 30] These gains can be achieved without compromising or diminishing the underlying intent of the regulation by focusing on addressing duplication, jurisdictional inconsistencies and other inefficiencies.

Benefit: Preparing Australia's digital infrastructure for the future

Mobile broadband is playing an increasingly important role across Australia, with data consumption per subscription increasing at 30% per year over the past decade.[31] This change reflects a long-term shift in how people access information, services and opportunities. At the heart of this is spectrum; the fixed natural resource that enables much of the digital economy.

Increasing use of some technologies, declining use of others, and the emergence of infant technologies to be commercialised in the future will change how Australia needs to use and allocate scarce spectrum. As such, Australia needs a long-term plan. A plan to ensure spectrum is utilised to maximise public benefit and economic outcomes.

While the Australian Communications and Media Authority's (ACMA) Five-Year Spectrum Outlook is a useful planning tool, many of these trends will play out over a longer period of time. An overarching policy direction that helps ensure decisions being made today align with the needs of tomorrow is essential.

The certainty created through an overarching policy direction will help ensure investments align with the long-term needs of Australia. International evidence shows increased certainty of spectrum increases investment. For example, one European study finds that each additional year of licence duration is linked to around a €1.5 increase in annual investment per capita and roughly 10 per cent higher data traffic growth.[32,*]

* Well-designed and transparent licensing regimes are associated with higher long-term investment and greater innovation in wireless services.[33] The mechanisms used to deliver certainty, however, require careful design. Longer licence terms can, in some market structures, entrench incumbents and reduce the spectrum available to potential competitors. However, research across OECD countries find no significant negative impact of longer licence duration on mobile market competition.[34] In practice there is also unlikely to be potential new entrants with the ACMA reporting little evidence of such a player after three years of consultation on spectrum.[35]

Regulators must nonetheless weigh a range of considerations when designing more durable frameworks. Greater rigidity can reduce flexibility to respond to emerging technologies or correct allocations that prove suboptimal. The challenge is to deliver the certainty that long-term infrastructure requires without limiting the ability to adapt.

02
Immediate opportunities

2.1 Establish a Digital Infrastructure Coordinator General

A national coordinator role would support streamlined governance to accelerate digital infrastructure

Helping stakeholders coordinate planning and reform would accelerate infrastructure deployment

Parts of government can sometimes work in isolation, duplicating effort and moving in different directions over time. Many jurisdictions are not currently operating at best practice, contributing to the average time to secure development approval for a new telecommunications facility being approximately 211 days, or about six and a half months.[1]

A lack of consistent, state-level direction means even well-supported, federally funded mobile infrastructure can be stalled at the local level. For example, a Peri-Urban Mobile Program (PUMP) funded project in Silvan was initially refused by the Yarra Ranges Council, despite being a part of Council's advocacy program and proposed in a region where 34 communities lost all internet services during a 2021 storm.[2]

With the Victorian Civil and Administrative Tribunal (VCAT) ultimately overturning the refusal, this case highlights why well understood and coordinated planning approaches are critical to ensuring communities get the infrastructure they require in a timely manner.

While there are existing pathways to facilitate projects of national significance, mobile infrastructure falls within a policy gap. For example, a strategically important infrastructure upgrade across a regional area may be treated as 30 separate small projects with 30 separate administrative processes rather than one major project. This means they fail to attract assistance through pathways such as the Major Projects Facilitation Agency.

Establish a national Digital Infrastructure Coordinator General (DICG) to help coordinate strategic and statutory planning for digital infrastructure.

The DICG would provide unified guidance for digital infrastructure policy and investment, covering both statutory planning (development approvals for mobile infrastructure) and strategic planning (integrating mobile connectivity into precinct and land-use planning from the outset). The DICG would help reduce planning barriers across eight states and territories and 537 local councils, tackling the fragmentation and delay that make deployments lengthy and costly.[3]

The core purpose of the DICG is to centralise expertise, coordinate government efforts, and act as a concierge for strategic projects. The DICG would act as a facilitator for the major mobile infrastructure projects that are strategically significant in aggregate but administratively orphaned as individual sub-major projects. It would also support states and councils to implement the MTWG's Report's recommendations.

The DICG could sit within the Department of Communications (DITRDCSA), in a similar fashion to the Cyber Coordinator which sits with Department of Home Affairs.[4] This placement would leverage the Department's existing infrastructure coordination and communications capabilities, and cross-sectoral convening

power whilst maintaining appropriate distance from commercial interests. The DICG could adopt a model like Treasury's Investor Front Door (IFD) or WA's proposed Coordinator General. The IFD helps significant projects navigate approvals, while WA's role can fast-track developments and coordinate agency support.

Centralising advisory functions will streamline regulatory processes and facilitate reform.

The DICG's remit should also extend to improving land access, including efficient access to land. It can play a role in facilitating access to Crown land, ensuring sites are available to meet community needs.

The DICG would help streamline and harmonise regulatory processes. Over time, its experience in helping industry overcome deployment and investment barriers would also position it to advise the Government on priorities for national digital infrastructure legislative and policy reform. This includes providing the states and territories with guidance on implementing the mobile components of the expanded TIND. While amendments to the TIND have been made to help ensure Australians in new developments have mobile connectivity from day one, the policy expectation is not binding. Progress is stalled because developers lack a single point of truth, and without clear government guidance on how to execute the TIND policy's expectations, they are unlikely to know how to act. The DIGC could support a more unified national approach, helping states and territories to embed consistent guidance into their planning frameworks.

Creating additional transparency and accountability across infrastructure delivery

By centralising expertise and coordination, the DICG would improve transparency and accountability in digital infrastructure delivery. A single national body would provide consistent guidance on policy expectations, planning requirements and timelines for projects of significance, reducing ambiguity for industry, states and councils. The DICG could publicly track project milestones for significant projects and report on implementation progress across jurisdictions.

An advisory body for digital infrastructure has had success in the US

The Federal Permitting Improvement Steering Council (Permitting Council) in the US provides a useful example of the benefits of integrated approvals across sectors. While its scope is not focused specifically on mobile infrastructure, it demonstrates processes which the DICG could draw from. It is coordinated by the National Telecommunications and Information Administration (NTIA) and Federal Communications Commission (FCC) and provides a single point of contact for broadband and data centre approvals. It streamlines permitting by coordinating across agencies, reducing duplication and delays. This approach expedites rural mobile projects and accelerates deployment of mobile solutions. Projects handled by the Federal Permitting Improvement Steering Council decreased the average time to complete an environmental impact statement from about 4.5 years down to approximately 2.5 years.[5]

The coordination provided by the DICG would play a critical role in enabling digital infrastructure deployment. The body is not an additional approvals layer but a coordinator to help streamline existing processes. Specific functions of the DICG should include:

- **Planning incentives and national coordination:** Design and administer time-bound planning incentives and standard approvals materials (templates, data formats, checklists); drive consistent uptake across councils, states and territories (see 2.2).
- **Program delivery and rollout support:** Facilitate delivery of key programs like Mobile Black Spot Program (MBSP), and PUMP by helping successful bidders have smooth approvals processes and overcome delays; advance stalled projects and track milestones.
- **Land access and utilities facilitation:** Facilitate Crown land availability for mobile infrastructure in line with the MTWG Report commitment to make suitable land available. It would also help the government establish principles for non-discriminatory access, such as removing co-user fees, and agree clear service standards for power connections to cut wait times that can reach two years.
- **Government engagement and policy shaping:** Convene state and local governments to harmonise rules, streamline processes, support access for regional communities, and align efforts with community-backed priorities.
- **TIND implementation support:** Act as a central co-ordination point for implementing the TIND policy's mobile components. This involves working with state and territory governments to embed mobile-ready provisions into their planning frameworks, providing a single source of guidance for developers and ensuring new communities are connected from day one.

This approach improves regulatory efficiency and fosters innovation. It positions Australia as a digital leader and ensures faster, more efficient delivery supporting national economic and social priorities.

Stakeholders impacted by the DICG

Better regulatory coordination through the DICG means better connected Australian communities and businesses.

Communities

Faster access to reliable mobile coverage – helping improve coverage gaps for up to 180,000 to 250,000 Australians each year and reducing blackspots in disaster-prone regions, and strengthening connectivity for vulnerable communities, including people relying on mobile access as a critical safety lifeline.

Industry

Consistent, national planning guidance and one-stop project support could unlock up to $160 million in new infrastructure investment annually by accelerating approvals and cutting delays. Given mobile's role in the broader digital infrastructure ecosystem, a national DICG could also create spillover benefits (e.g., for fibre, cloud, satellite, data centres and critical IoT).

Local & State Governments

Less duplication, streamlined processes, and expert support make it easier to deliver on national priorities and connect even hard-to-reach areas.

Developers

A clear, single "source of truth" for infrastructure requirements eliminates confusion and costly delays, ensuring new communities are connected from day one.

To best realise these outcomes, it is important that the DICG be appropriately structured so that it acts to streamline existing regulation rather than duplicating existing processes or adding another layer of bureaucracy.

2.2 Create a harmonised planning framework with adoption incentives

A national planning code would reduce fragmentation and accelerate digital infrastructure rollout

Fragmentation across 537 local councils creates a patchwork of inconsistent rules, documentation, and timelines.

The Australian Competition and Consumer Commission (ACCC) has identified that differing planning and approval rules across jurisdictions are lengthy, costly, and significantly affect deployment.[6] Resistance to regulatory updates is entrenched, with few mechanisms to reward proactive behaviour or offset the costs of reform.

Environmental assessment for telecommunications facilities is often subjective, with unclear parameters and locally variable controls that add uncertainty and invite dispute.

Without clear incentives, risk-averse defaults prevail, stalling transformation and lifting delivery costs. Queensland exemplifies the issue: 77 councils administer inconsistent schemes, increasing costs, lengthening approvals, and reducing rollout certainty for carriers.[7]

A nationally consistent digital infrastructure planning and approvals framework should incentivise alignment of fragmented local regimes.

This framework, building on AMTA's existing work on mobile infrastructure deployment, would embed objective approval criteria and consistent environmental controls across jurisdictions to remove ambiguity and delay.[8] The framework would include:

- **A model planning code:** A nationally applicable planning code defining telecommunications facility classes, zoning principles, standards, and proportionate assessment pathways for all jurisdictions.
- **Consistent approval requirements:** A consistent set of requirements applicable to Crown, private, and public land. This would standardise fees, required documentation, and land-access steps.
- **Common data requirements:** Standardised data formats for spatial, technical, and environmental information. Councils could adopt these without customisation, ensuring predictable and comparable assessments.
- **National minimum standards:** Clear standards establishing streamlined assessment for low-impact facilities, consistent environmental rules, and firm decision deadlines that align with Commonwealth planning principles.[9]

Co-design and close collaboration with industry is essential. Developing templates, checklists and standardised information requirements jointly and early can significantly accelerate adoption and prevent fragmentation.

The framework should be paired with an incentive program for local government to align local practice with national priorities.

Local councils often face significant resource constraints, making it difficult to manage complex planning approvals or adopt new national frameworks without support. To address these constraints and drive uptake, a time-limited program could offer councils financial incentives depending on size, for adopting the framework and meeting agreed milestones. These reforms complement the central role of councils in assessing proposals and reflecting community expectations by strengthening consistency. The incentive could be funded by the Productivity Fund, aligning with its goals to reduce regulatory friction and boost infrastructure delivery. Additional funding could come from reallocated regional connectivity funds or co-funding with states.

Milestones would reward early adoption, timely updates to local instruments, and measurable improvements in approval timeframes. Crown land agencies could also be required to offer suitable sites for mobile infrastructure on reasonable terms, where there are no alternatives on nearby freehold land. At a minimum, rentals charged by the Crown land agencies to carriers should be no greater than what they charge to other users of Crown land. This is also inconsistent with the Act (Schedule 3 clause. 44) and would ensure that access to Crown land is not a barrier to deployment of telecommunications infrastructure - benefiting people who live nearby. Incentive payments could potentially offset any revenue shortfall from this approach.

This performance-based payment structure mirrors successful programs like the New Home Bonus, where reform-contingent funding accelerates planning changes.[10] Over time, government co-funding could help to incentivise adoption by the states in future — for example, by linking Commonwealth funding to state and territory government support for streamlined and harmonised planning frameworks (such as those agreed through Planning Ministers forums). This may be complemented by activities by the DICG to influence state governments to proceed with reformed planning laws (refer to 2.1).

Two examples from the US also demonstrate what this reform could look like. The FCC has implemented rules by interpreting the *Federal Communications Act* to make it easier to deploy wireless and broadband in 2018.[11, 12] The US Permitting Council Executive Director also has the ability to transfer funds to agencies and governments to facilitate timely and efficient approvals.[13]

For carriers, greater consistency aligned with national best practice would reduce complexity and cost.[14] Councils would benefit from clearer rules, shared resources, and support, similar to state-level housing reforms. Planning standardisation gives industry predictable delivery pathways, while targeted incentives lower transition costs and recognise local government effort. This approach delivers immediate productivity gains and embeds lasting reform as councils adopt common standards. By demonstrating early benefits for all stakeholders, this program would strengthen collaboration and build confidence in the reform agenda.

Stakeholders impacted by a harmonised planning framework

A harmonised approach removes the roadblocks of fragmented rules, unlocking faster, fairer, and more cost-effective connectivity for all Australians:

Communities

Up to $430 million in additional annual infrastructure expenditure contributing to more consistent and timely access to mobile services, improved coverage and supports for day-to-day needs in both urban and regional areas.

Local Councils

Receive direct incentive funding, plus practical tools and templates, making it easier to modernise planning processes and free up staff for other priorities.

Industry/Carriers

Gain national consistency that reduces regulatory uncertainty and resource drain, enabling smoother project delivery and supporting greater investment in network expansion.

Governments

Achieve national productivity gains, reduce regulatory duplication, and strengthen alignment between Commonwealth, state, and local priorities – delivering visible progress on the digital infrastructure agenda.

In establishing a harmonised planning framework, it is important that best-practice be adopted with consideration of what is best for all stakeholders and the total budgetary cost of the incentive delivers net national benefits.

2.3 Amend Schedule 3 of the *Telecommunications Act*

Risk-based amendments to Schedule 3 with a fast-track to unlock low-impact builds and accelerate capacity

Powers and immunities are too restrictive limiting designation to building-attached towers under five metres, capacity improvements and regional rollout.

Schedule 3 grants carriers statutory powers to enter land, inspect, install and maintain low-impact telecommunications facilities, subject to defined notice and restoration obligations. It creates a national permissions framework that overrides most state and local planning controls for these low-impact works, enabling faster deployment of essential infrastructure. It also sets limits on when the powers can be used and prescribes conditions to protect landholders and the environment.

Maintenance powers are ambiguous following court interpretation of clause 7(3)(e), hindering installation within existing facilities and routine upgrades.

Amendments to the Schedule 3 are required to focus on expediting deployment of national telecommunications networks, balancing this with protection of areas of environmental significance and Indigenous cultural heritage laws.

A nationally consistent approach aligns with broader government priorities to accelerate critical infrastructure, with recent intergovernmental work noting the Commonwealth could legislate to standardise deployment settings for larger assets.

Federal legislation needs modernising as several parts are no longer fit for purpose.

Amendments to Schedule 3 are required to focus on expediting deployment of national telecommunications networks, balancing this with protection of areas of environmental significance.

These amendments should adopt a risk-based approach, applying streamlined processes to low-impact deployments whilst preserving rigorous assessment for genuinely sensitive sites or high-impact works. Specific changes to Schedule 3 include:

- **Clarify maintenance provisions** to confirm installing an additional unrelated facility within an existing facility under clause (73)(e) of Schedule 3 constitutes a maintenance activity, addressing uncertainty created by the 2022 Qld vs TIO/Optus Federal Court decision that narrowed carriers' ability to use maintenance powers for co-location.
- **Clarify that replacement facilities should not exceed the visual apparent volume of the existing facility** by amending subclause (75)(c)(ii) to, allowing like-for-like replacements (e.g. underground cables larger in physical size but visually equivalent) without triggering new approval requirements.

- **Update height and attachment criteria** to expand low-impact status beyond just building-mounted towers under five metres.
- **Define emergency works** to allow immediate fault rectification where delays threaten safety or essential connectivity. This definition must clarify how these powers interact and balance with other laws, such as environmental and Indigenous cultural heritage protections, that may restrict rapid access.
- **Expand Schedule 3 to designate certain standalone rural and industrial towers as low-impact where a need for the new infrastructure has been established which cannot be met by existing infrastructure.** AMTA estimates that this would mirror the NSW Complying Development model, which reduced approval times from approximately 211 days to 117 days.[14]
- **Codifying restoration standards**, adopting model access agreements, and undertaking periodic reviews will improve consistency and keep the framework current.

These reforms should draw on the forthcoming AMTA paper on this topic, which details a series of common-sense changes.

Demonstrated success in state jurisdictions

Changes to federal legislation should be supported by tailored planning controls to support deployment at the state level. For example, since 2010 under planning rules of successive NSW State Governments, new poles or towers in rural and industrial areas in NSW have been able to be deployed as 'Complying Development', without the need for Development Approval from Councils.[15] To qualify as 'Complying Development' several conditions must be met by mobile infrastructure providers including limiting the height of poles and towers relative to the distance to residentially zoned land. Expanding this approach nationally would not only streamline infrastructure deployment but very clearly prioritise the importance of mobile connectivity to Australians in line with other essential utilities.

Stakeholders impacted by amendments to Schedule 3 of the Act

Modernising Schedule 3 means faster, more cost effective upgrades with robust safeguards; keeping Australia connected when it matters most:

Communities

Quicker restoration of service after outages and emergencies, and faster upgrades to critical infrastructure – particularly in regional and disaster-prone areas.

Landholders

Greater clarity about restoration standards and protections, ensuring that works are done respectfully and with clear obligations for reinstatement.

Industry/Carriers

Clearer, nationally consistent rules reduce legal uncertainty and costly delays, supporting timely upgrades and network expansion – mirroring best-practice models that can halve approval times.

Governments

Stronger alignment between national, state and local priorities, better disaster resilience, and more effective delivery of digital inclusion and infrastructure targets.

The key objective of modernising Schedule 3 is that it ensure certainty and timeliness for low-impact changes while still allowing appropriate pathways to scrutinise higher risk projects.

03

Long-term reforms

3.1 Develop a National Spectrum Strategy

A strategy to provide investment certainty, drive efficient allocation, and secure Australia's 6G future

Short-term spectrum planning leads to inefficient allocation, underutilisation, and investment uncertainty.

Short-term spectrum planning creates uncertainty about renewal pathways and future uses of key bands. Overtime this decreases investment certainty and slows opportunities for innovation.

While the ACMA's Five-Year Spectrum Outlook is a useful planning tool, long term Government strategic policy direction about how to prioritise competing uses is essential to ensure Australia has adequate spectrum to stay at the forefront of technological evolution) and meet growing demand in regional and rural areas.

The lack of a clear long-term vision limits the degree to which all industries that rely on spectrum can efficiently allocate resources. A more aligned national vision would also foster a joint focus on outcomes between the sector, government and regulators.[1]

Major partners are already moving towards long-term spectrum planning. This includes the United States' National Spectrum Strategy, the UK's Wireless Infrastructure Strategy and the EU's 6G strategic work through the Radio Spectrum Policy Group.[3, 4, 5]

Australia must develop a National Spectrum Strategy to define spectrum's strategic value as a vital national resource for economic growth, social inclusion and national security

Spectrum is the invisible infrastructure underpinning all wireless communications. A national strategy must establish clear allocation, licensing, and reassignment plans to ensure this finite resource is used efficiently to support Australian leadership in advanced and emerging technologies. For example, it must define forward looking policies and inform the Australia's position in international fora such as the ITU World Radio Conferences to support AI-enabled networks and 6G readiness and prepare the way for the future of TV and satellite to mobile services.

Critically, the spectrum strategy must also address security and sovereignty considerations—ensuring resilient national communications, trusted supply chains, emergency services capability, and the flexibility to adapt allocations as technologies and threats evolve.

A national strategy would elevate spectrum from a narrow regulatory issue to a core economic, security and national capability decision. This approach aligns with international counterparts like the United States' National Spectrum Strategy and the United Kingdom's cross-government spectrum statement.[5,6] The strategy should:

- **Strengthen governance** by establishing a central coordination mechanism that unites security, emergency, infrastructure, digital, and sectoral interests to develop a unified government policy view on spectrum priorities, ensuring allocation decisions align with national economic and capability objectives rather than ad-hoc departmental input.

- **Create a transparent consultation process** where government and industry perspectives inform a long-term strategic policy direction that guides ACMA policy direction, addressing in Australia's evolving spectrum needs structural shifts that require planning horizons and national strategic vision beyond standard regulatory cycles. It is important this collaboration occurs both early and often in the process, which should shorten adoption timeframes and reduce the risk of misalignment.
- **Maintain ACMA's technical regulatory independence** for spectrum management whilst ensuring licensing frameworks provide investment certainty and support emerging technologies aligned with national priorities.

A long-term strategic policy direction provides the investment certainty needed for next-generation infrastructure

Modern licensing and spectrum frameworks increase utilisation and support emerging use cases (e.g., internet-of-things (IoT), private networks, and satellite-to-mobile services) while accounting for growing mobile demand in regional and rural areas. International experience shows that countries combining long-term strategies with modern spectrum frameworks are better placed to commercialise advanced wireless technologies and avoid capacity bottlenecks.

Stakeholders impacted by a National Spectrum Outlook Strategy

A National Spectrum Strategy means making the best use of the "invisible infrastructure" powering Australia's connected future:

Communities

Access to the latest technologies, facilitated by spectrum planning and allocations, that will drive productivity and social benefits (e.g., enhanced connectivity and participation in the digital economy).

Industry/Carriers

Long-term certainty on spectrum allocation unlocks investment, supports innovation, and reduces the risk of bottlenecks as demand surges and new technologies like 6G and AI-enabled networks emerge.

Governments & Regulators

Enables transparent, coordinated decision-making across agencies, improves national security and public safety, and aligns Australia with global best practice, positioning the nation for the next wave of digital growth.

In designing the strategy, it is crucial to balance long-term certainty with flexibility, competition and the ability to respond to emerging needs of the community to ensure spectrum serves the public interest.

3.2 Create planning and land access exemptions for government co-funded sites

Targeted planning relief and land access to unblock critical black spot builds and deliver coverage faster

Telecommunications site approvals are frequently delayed or blocked by local planning processes, even in communities actively campaigning for improved coverage.

Recent evaluation of the MBSP finds that the median project delivery timeframe for mobile black spot solutions is around three years.[7] However, many projects take closer to four or five years from funding to completion, and some as long as nine. These timeframes underscore the impact protracted planning and access issues have on delivering the infrastructure communities need.

In August 2024, it was also reported that 176 MBSP builds were delayed due to local and state planning issues, creating "frustrated sites" where essential infrastructure cannot be delivered, despite clear need and allocated funding.[8]

Delays mean less government funding to less blackspot funded sites, directly impacting consumers. Every month of delay for government funded projects due to protracted approvals processes adds holding costs, redesign and re-work risk, consultant and legal cost, and uncertainty. These added costs mean fewer black-spots are addressed, leaving Australians in slower-to-approve locations behind or without service at all.

Telstra CEO Vicki Brady has highlighted the regulatory burden on infrastructure delivery, noting that the volume of legislation, regulation and differing requirements across states and territories has added significant cost and complexity to rolling out digital infrastructure — even where government and industry have aligned on the need to invest.[9]

Government often co-funds sites in response to community demand. However, planning delays and land access barriers can prevent delivery, undermining the very investment these co-funding processes were designed to support. The lack of effective mechanisms to deal with local objections or secure land access leads to prolonged service gaps, higher costs, and persistent digital inequity.

Adopt targeted planning exemptions for prioritised, government co-funded areas (such as PUMP or MBSP) to streamline approvals

Such exemptions are needed to clear the backlog of stalled sites and accelerate the delivery of critical mobile coverage to underserved communities.

This requires a clear legal process for ministerial step-in powers to approve a site when there is clear public interest, overriding local rejections.

These exemptions provide a necessary tool for timely intervention. They ensure critical projects cannot be indefinitely blocked by stalled negotiations, providing a final pathway to deliver essential services to communities that have requested them.

Targeted planning exemptions for co-investment sites will accelerate infrastructure rollout, reduce regional service gaps, and deliver faster, fairer access for communities.

These measures would help reduce blackspots by ensuring funded projects, already promised to regional communities, are not stranded by planning or land-access barriers.

Removing these constraints will build on the more than $1 billion already invested in co-investment programs like the MBSP, which has delivered up to 1,400 new mobile base stations across Australia.[10]

An overview of the Victorian blackspots model

Victoria's model streamlines approvals for mobile infrastructure projects that have Commonwealth or State funding, such as MBSP and PUMP sites. Under the *Planning and Environment Act 1987 and Victorian Planning Provisions*, development applications for these prioritised sites are exempt from third-party notice and review requirements.

This exemption is effective because it removes a significant source of delay and uncertainty, allowing carriers to proceed with construction faster once a site is identified and funded, ensuring government-prioritised coverage is delivered to communities more quickly.

Stakeholders impacted by improvements to land access for co-funded sites

Targeted exemptions turn promised infrastructure into real connectivity – faster, fairer, and where it's needed most:

Communities

Receive critical mobile coverage and upgrades between 25 to 50 per cent sooner, closing persistent blackspots and supporting safety, education, and local economies – especially in regions where some sites have waited up to nine years for connection.

Industry/Carriers

Gain certainty and efficiency to deliver funded projects without costly delays, reducing project timelines and cutting through red tape that has stalled over 170 sites nationwide.

Governments

Ensure taxpayer investment delivers tangible results, reduce frustrating project backlogs, and provide a clear pathway to resolve deadlocks – helping turn government funding into real coverage for communities in need.

In implementing targeted exemptions, it is important to keep in mind is the risk of eroding community trust if projects are at odds with community desires. These exemptions should be designed to deliver infrastructure where there is a true community want and need.

It should also be noted that, whilst planning exemptions for co-funded sites would remove a significant administrative barrier, deployment success also depends on a range of other factors. This means planning reform alone will not guarantee accelerated rollout – including unless there is parallel progress on land access and commercial frameworks.

3.3 Implement a process for streamlining the Act over time

An industry-led reform process with government to progressively simplify and future proof the Act

The *Telecommunications Act* (the Act) is complex, prescriptive, and slow to adapt to rapid technological change.

This imposes high compliance costs and delays network deployment. Several layers of rules covering security, privacy, and critical infrastructure interact with the Act, increasing the administrative burden and costs for carriers. The Act contains duplicative obligations, ambiguous definitions, and one-size-fits-all rules. These create legal uncertainty and treat low-risk activities as high-risk in the same way, unnecessarily increasing costs.

Furthermore, the absence of a systematic, evidence-based review process allows obsolete provisions to persist. This results in piecemeal reforms often driven by limited consultation and additional complexity over time.

Establish an industry-led streamlining process for the Act with clear governance, a firm mandate, and a fixed timeline for delivery.

This process should be embedded within the Commonwealth's wider regulatory reform agenda to lower compliance costs and lift productivity across the economy. The process should:

- Prioritise amendments that yield the highest productivity gains. It should use a tiered, risk-based approach. For example: streamlined approvals for low-risk work, lighter rules for medium-risk work, and stricter rules for high-risk work, all governed by firm and enforceable decision deadlines.
- Unite industry and government through an open, iterative consultation process. This must involve industry, communities, councils, and safety agencies. It requires published exposure drafts, cost-benefit analyses, and staged implementation windows to manage transition risk.

This streamlining process will future-proof the Act, ensuring it remains effective as future generations of telecommunications technology are introduced.

A formal, recurring reform mechanism replaces ad-hoc fixes with durable, evidence-based improvements.

By prioritising high-value changes, this process concentrates effort where approval times and industry costs can be reduced most effectively. A risk-based approach would lower the compliance burden for routine works while retaining necessary controls, which reduces transactional costs and speeds up rollouts. This is critical in an industry where 2,000 employees (2.4% of the industry's total workforce) are dedicated to regulatory compliance.[11]

Iterative consultation and published impact analysis provide transparency and legal certainty, increasing investor confidence and reducing unintended consequences. Finally, staged implementation protects service continuity while embedding a culture of continuous regulatory simplification.

Stakeholders impacted by streamlining and modernising the Act

Modernising the Act means less complexity, faster innovation, and a telecommunications sector that can keep pace with Australia's digital future:

Communities

Faster infrastructure rollouts and lower costs mean earlier access to new technology, better service quality, and potentially more competitive pricing.

Industry/Carriers

A risk-based, streamlined Act cuts compliance costs and frees up resources, helping shift thousands of hours from red tape to building better networks and unlocking up to $150 million in annual productivity gains.

Governments & Regulators

An industry-led, transparent process ensures reforms are evidence-based, durable, and easier to implement – lifting national productivity while maintaining strong safeguards for safety and privacy.

It is also important to recognise that regulatory reform takes time and resources, and there will always be pressure to add new requirements even as old ones are removed. Over time, new regulation may be warranted in order to respond to changing circumstances in a dynamic sector.

04
Conclusion

4.1 Conclusion

A cohesive national approach that accelerates delivery and strengthens investment certainty

Modern policy and regulation for Australia's mobile future

Telecommunications regulation is more than a sector specific issue. Regulatory modernisation should be a national productivity imperative. With demand for data rising and endorsed national principles already in place, the time for coordinated reform is now.

A DICG would drive strategy and unblock stalled projects, while a harmonised national planning framework with targeted incentives would reduce local inconsistencies. An industry-led streamlining process for amending the Act will embed change and a long-term National Spectrum Strategy will help Australia plan for the future.

The targeted and proportionate reforms outlined in this report could deliver a range of benefits to communities, government and the telecommunications sector. This includes:

- Accelerating the development an additional 150 to 200 mobile sites, improving coverage to roughly 180,000 to 250,000 people sooner each year.
- Up to $430 million in additional telecommunication infrastructure expenditure as a result of a modernised approach to regulating telecommunications.
- Up to $150 million in annual productivity gains in the telecommunications sector due to a more cohesive national approach to planning, streamlined approval for low-impact use cases and reduced duplication. This would free up resources for innovation, improving consumer outcomes and financial sustainability.

A note on sequencing and timing of reforms

Reforms should be sequenced to deliver value and build momentum. The process should start with immediate opportunities: such as initiating the process of establishing the DICG, and creating a harmonised planning framework with adoption incentives. Longer running regulatory, policy and legislative processes could be commenced in parallel.

It is critically important, though, that co-design and collaboration with industry are prioritised over this reform journey. Early joint development of templates, checklists and standardised information requirements can materially shorten adoption timeframes and reduce fragmentation later.

In addition to considering the sequencing of the reforms themselves, consideration should be given to the requisite preparatory work for each reform (e.g., principles, consultation drafts etc.), and to the way the timing of reforms aligns with federal political cycles. Table 1 outlines the next steps for each reform.

Table 1 Next steps to implement report's recommendations

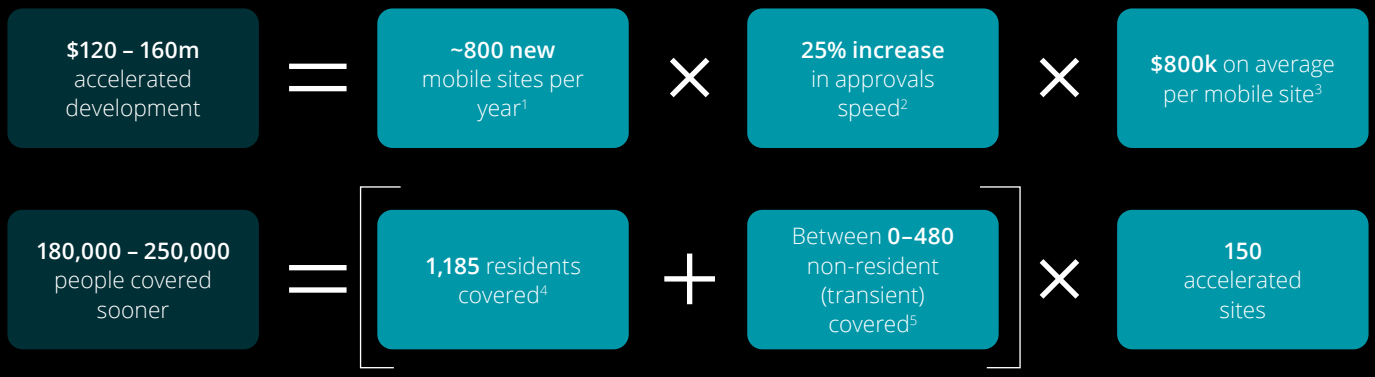
Reform	Problem solved	Primary lead	Other stakeholders	Next steps
1 **Establish a Digital Infrastructure Coordinator General**	Addresses regulatory fragmentation and uncoordinated policy execution. Provides central coordination to overcome delays and drive national priorities.	Commonwealth (DITRDCSA or other nominated agency)	States & territories, councils, industry	Establish a DICG mandate and governance. Publish roles of the DICG spanning planning incentives, program delivery, and spectrum oversight. Organise a 6-12 mobilisation plan.
2 **Create a harmonised planning framework with adoption incentives**	Replaces fragmented and inconsistent local planning rules with a single national code. Reduces delays, costs, and ambiguity for faster, predictable deployment.	Commonwealth (DICG) & State planning agencies	Local councils, industry (carriers), AMTA	Develop a model planning code and common data standards for required information. Work with State and Territory planning agencies to implement this framework into their respective legislation. Create an incentive for adoption with clear milestones and payments for early adopters.
3 **Amend Schedule 3 of the Act to adopt a risk-based approach**	Modernises outdated, one-size-fits-all rules. Clarifies maintenance and emergency works and expands low-impact classifications to speed up routine deployments.	Commonwealth (Attorney / Communications)	Industry, states, heritage & safety agencies	Draft risk-based Schedule 3 amendments including expanded low-impact classes, maintenance provisions and emergency works.

Reform	Problem solved	Primary lead	Other stakeholders	Next steps
4 **Develop a National Spectrum Strategy**	Elevates spectrum from a short-term regulatory issue to a core national priority. Provides long-term certainty for investment and aligns planning with future technology.	Commonwealth, with input from industry spectrum users	National security, emergency services, industry, ACMA	Create a transparent consultation process where government and industry perspectives inform the framework for a National Spectrum Strategy to define spectrum's strategic value as a vital national resource for economic growth, social inclusion and national security
5 **Create planning and land access exemptions for government co-funded sites**	Overcomes local planning and land access barriers that stall critical MBSP projects, ensuring funded coverage reaches underserved communities without indefinite delays.	Commonwealth + State land/ planning agencies	Councils, Crown land bodies, industry	Implement statutory triggers and a provider-of-last-resort land access mechanism for MBSP/PUMP sites. Standardise commercial multi-carrier site terms.
6 **Implement a process for streamlining the Act over time**	Creates a durable mechanism to modernise the complex and slow-to-adapt Act. Reduces cumulative compliance costs and ensures regulation keeps pace with technology.	Industry-led panel with government partnership, or independent reviewer with industry input	Consumers, safety agencies, councils	Establish industry-government review body with fixed timelines. Published exposure drafts and staged implementation windows

Appendix

This quantification draws on observed outcomes from comparable domestic and international initiatives rather than bespoke economic modelling. Actual impacts will depend on the specific design and implementation of any policy change. It is also worth noting that accelerated investment represents expenditure brought forward in time rather than net new spending in the economy. The figures below are intended to indicate the likely scale of impact, not to provide a precise forecast.

Method 1 Accelerated development based on reduction in approvals wait times



1. Australian Competition and Consumer Commission, Communications Market Report 2025, Chapter 3.4

2. Conservative estimate based on comparable reforms in other jurisdictions.

3. Approximation based on Australian Government Mobile Black Spot Programme data (~$714K/site average) and industry submissions to the ACCC's Regional Mobile Infrastructure Inquiry, 2023.

4. Based on Australian Bureau of Statistics population data (June 2025), AIHW remoteness area shares, and ACCC Mobile Infrastructure Report (2025) site counts.

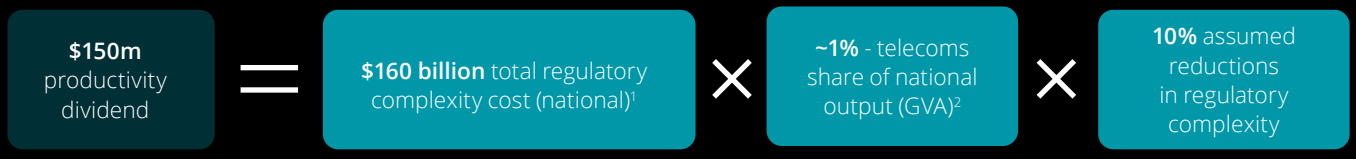
5. Ibid.

Method 2 Increase in sectoral investment from improved regulatory practices

1. International Telecommunication Union research from 2021

2. Australian Bureau of Statistics, Australian Industry 2023-24

Method 3 Estimated productivity dividend from reduced regulatory complexity



1. Estimate from Mandala Regulatory Burden Analysis report, published 2025

2. Approximation based on Information, Media and Telecommunications (Telecommunications services) Gross Value Added via the Australian Bureau of Statistics

References

Executive summary

1. Australia Communications and Media Authority, 'How we use the internet – Executive summary and key findings' (December 2024) https://www.acma.gov.au/sites/default/files/2024-12/How%20we%20use%20the%20internet%20-%20Executive%20summary%20and%20key%20findings.pdf
2. Deloitte Access Economics, (March 2022). '5G unleashed: Realising the potential of the next generation of mobile technology.' https://amta.org.au/wp-content/uploads/2022/03/5G-Unleashed-Final-Report_combined-v2.pdf
3. Based on industry data collected and provided by AMTA

1. Introduction

1. International Telecommunication Union (ITU), Fixed and mobile subscriptions – Australia', ITU Data Hub, 2024
2. Australia Communications and Media Authority, 'How we use the internet – Executive summary and key findings' (December 2024) https://www.acma.gov.au/sites/default/files/2024-12/How%20we%20use%20the%20internet%20-%20Executive%20summary%20and%20key%20findings.pdf
3. Deloitte Access Economics, (March 2022). '5G unleashed: Realising the potential of the next generation of mobile technology.' https://amta.org.au/wp-content/uploads/2022/03/5G-Unleashed-Final-Report_combined-v2.pdf
4. Deloitte Australia 2025). 'TMT predictions 2025' https://images.content.deloitte.com.au/Web/DELOITTEAUSTRALIA/%7Ba0ea5193-6c66-4440-a83c-41b209ee19f3%7D_DeloitteAUS_TMT_Predictions_2025.pdf
5. Queensland Productivity Commission, 'Opportunities to improve productivity of the construction industry" (October 2025) https://qpc.qld.gov.au/docs/construction-productivity/QPC_Final%20Report_24%20Oct%202025.pdf
6. Telecommunications Industry Ombudsman. 20 February 2025). 'Telco complaints surge in Quarter 2.' https://www.tio.com.au/news/telco-complaints-surge-quarter-2
7. Chalmers, Jim. 'Address to the National Press Club, Canberra', speech, National Press Club, Canberra, 18 June 2025. Australian Government, Treasury. https://ministers.treasury.gov.au/ministers/jim-chalmers-2022/speeches/address-national-press-club-canberra-5
8. Queensland Productivity Commission, 'Opportunities to improve productivity of the construction industry" (October 2025) https://qpc.qld.gov.au/docs/construction-productivity/QPC_Final%20Report_24%20Oct%202025.pdf
9. Standing Committee on Public Administration, Parliament of Western Australia 12 June 2024). 'Inquiry into regional telecommunications in Western Australia: Transcript of evidence, given by AMTA Australian Mobile Telecommunications Association'
10. Queensland Productivity Commission, 'Opportunities to improve productivity of the construction industry" (October 2025)
11. Australian Government Treasury, 'Consultation hub – Economic Reform Roundtable' (25 July 2025) https://consult.treasury.gov.au/economic-reform-roundtable-2025
12. Regional Telecommunications Independent Review Committee, 'Connecting communities, reaching every region' (2024).
13. Australian Competition and Consumer Commission, 'Regional mobile infrastructure inquiry: Final report' (2023).
14. House of Representatives Standing Committee on Communications and the Arts, 'Connecting the country: Mission critical' (2023).
15. Regional Telecommunications Review, '2024 Regional Telecommunications Review' (2025) https://www.infrastructure.gov.au/sites/default/files/documents/2024-regional-telecommunications-review.pdf
16. Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, 'Improving mobile connectivity' (2024) https://www.infrastructure.gov.au/media-communications-arts/phone/telecommunications-infrastructure-deployment/improving-mobile-connectivity
15. Standing Committee on Communications and the Arts, Inquiry into co-investment in multi-carrier regional mobile infrastructure (2023) https://www.aph.gov.au/Mobilecoinvestment
16. Based on industry data collected and provided by AMTA
17. Federal Permitting Improvement Steering Council, United States, https://www.permitting.gov/

18. Australian Competition and Consumer Commission, Communications Market Report 2024–2025, December 2025.

19. Australia's total population was ~27m in June 2025 ABS, (National, State and Territory Population). The outer-regional and remote share of 9.8% is drawn from AIHW (2025), giving an estimated outer-regional/remote population of ~2,7m. The ACCC's Mobile Infrastructure Report 2025 reports 2,192 mobile base stations in remote areas and we assume 96% of this population has coverage, implying ~1,200 people per site.

20. Based on Australian Government MBSP data, which delivered approximately 1,400 base stations for a total investment exceeding $1 billion ($714,000 per site on average), with later rounds averaging $887,000–$907,000 per site for more remote locations. See Department of Infrastructure, Mobile Black Spot Program (https://www.infrastructure.gov.au/media-communications/phone/mobile-services-and-coverage/mobile-black-spot-program). The $800,000 figure is also consistent with the $1–3 million per-site range cited in industry submissions to the ACCC's Regional Mobile Infrastructure Inquiry, noting this range is also in reference to regional/remote sites: see ACCC, Regional Mobile Infrastructure Inquiry: Final Report, July 2023 (https://www.accc.gov.au/system/files/OneWiFi%20&%20Infrastructure.pdf)

21. Australian Disaster Resilience Index 2 and National Emergency Management Agency, 2025

22. Optus, Submission to the Regional Telecommunications Review, 2024

23. UK Wireless Infrastructure Strategy, 2023

24. Industry submissions to Ofcom on mobile infrastructure planning timeframes

25. International Telecommunication Union ITU), DataHub, Annual investment in telecommunication services, Australia, 2023. https://datahub.itu.int/data/?i=372&e=AUS. (Converted from USD to AUD using IRS conversion rate 2023).

26. International Telecommunication Union, The Impact of Policies, Regulation, and Institutions on ICT Sector Performance, 2021

27. Mandala Partners, $160bn and Counting: Resetting the Regulatory Balance, Australian Institute of Company Directors, 2025.

28. Mandala Partners, $160bn and Counting: Resetting the Regulatory Balance, Australian Institute of Company Directors, 2025.

29. Approximation based on Information, Media and Telecommunications Telecommunications services) Gross Value Added via the ABS Australian System of National Accounts, Table 5).

30. International Telecommunication Union (ITU), DataHub, Mobile broadband internet traffic, Australia, 2023.

31. Jeanjean, F., Lebourges, M. and Liang, J. (2019), 'The impact of licence duration on tangible investments of mobile operators', Telecommunications Policy, vol. 43, no. 9, doi:10.1016/j.telpol.2019.101835.

32. OECD (2022), Developments in Spectrum Management for Communication Services, OECD Digital Economy Papers, No. 332, OECD Publishing, Paris.

33. Jeanjean, F., Lebourges, M. and Liang, J. (2019), 'The impact of licence duration on tangible investments of mobile operators', Telecommunications Policy, vol. 43, no. 9, doi:10.1016/j.telpol.2019.101835.

34. 'Spectrum renewals: ACMA's mandate is promoting the public interest', CommsDay, (19 February, 2026), Australian Communications and Media Authority, <acma.gov.au/acmas-mandate-promoting-public-interest.>

2. Immediate opportunities

1. Standing Committee on Communications and the Arts, Inquiry into co-investment in multi-carrier regional mobile infrastructure (2023) https://www.aph.gov.au/Mobilecoinvestment

2. Yarra Ranges Council, (July 2022), 'Telecommunications advocacy report summary.' https://www.yarraranges.vic.gov.au/files/assets/public/v/1/webdocuments/council/advocacy/yarra-ranges-council-telecommunications-advocacy-report-summary.pdfVCAT

3. Ventia Pty Ltd v Whittlesea CC [2024] VCAT 173

4. United South and Eastern Tribes Sovereignty Protection Fund, 'Offshore Wind Development, Part II: FAST-41 Permitting' (February 2023) https://www.usetinc.org/wp-content/uploads/2023/02/OffshoreWindDevelopPartII-FAST41Permitting.pdf

5. Department of Home Affairs, Cyber Coordinator, https://www.homeaffairs.gov.au/about-us/our-portfolios/cyber-security/cyber-coordinator

6. Bipartisan Policy Center, 'Why Congress Should Permanently Authorize FAST-41' (2 August 2021) https://bipartisanpolicy.org/article/congress-authorize-fast-41/

7. Australian Competition and Consumer Commission, 'Regional mobile infrastructure inquiry' (July 2023) https://www.accc.gov.au/system/files/Regional%20Mobile%20Infrastructure%20Inquiry%20final%20report.pdf

8. Queensland Productivity Commission, 'Opportunities to improve productivity of the construction industry" (October 2025) https://qpc.qld.gov.au/docs/construction-productivity/QPC_Final%20Report_24%20Oct%202025.pdf

9. Australian Mobile Telecommunications Association, 'The Model Framework for Mobile Infrastructure' May 2024) https://amta.org.au/wp-content/uploads/2024/05/AMT_TheModelFrameworkforMobileInfrastructure.WEB-1.pdf

10. Australian Government Treasury, 'National Housing Accord' (last updated 2024) https://treasury.gov.au/policy-topics/housing/accord

11. FCC, Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, September 2018 (https://docs.fcc.gov/public/attachments/DOC-353962A1.pdf).

12. FCC, Build America: Eliminating Barriers to Wireline Deployments, Notice of Inquiry, WC Docket No. 25-253, September 2025 (https://docs.fcc.gov/public/attachments/DOC-414410A1.pdf).

13. Federal Permitting Improvement Steering Council Permitting Council), 'Our Mission & What We Do' (https://www.permitting.gov/about/our-mission).

14. See AMTA 5G State and Territory Readiness Assessment for examples of national best practice.

15. Australian Mobile Telecommunications Association, 'Deployment of Mobile Telecommunications Infrastructure 2023) AMT_TheModelFrameworkforMobileInfrastructure.WEB-1.pdf

Long-term reforms

1. GSMA, Vision 2024' (2025) https://www.gsma.com/connectivity-for-good/spectrum/wp-content/uploads/2025/11/Vision-2040-Future-Spectrum-Needs-v2.pdf

2. National Telecommunications and Information Administration, 'National Spectrum Strategy' (2023) https://www.ntia.gov/programs-and-initiatives/national-spectrum-strategy

3. UK Department for Science, Innovation and Technology, 'UK Wireless Infrastructure Strategy' April 2023) https://assets.publishing.service.gov.uk/media/64357c81877741001368d7fd/uk_wireless_infrastructure_strategy.pdf

4. Radio Spectrum Policy Group, 'RSPG Report on 6G Strategic Vision' (2025) https://radio-spectrum-policy-group.ec.europa.eu/document/download/89457260-ab6b-495a-9a10-437711cbe831_en?filename=RSPG25-006final-RSPG_Report_on_6G_strategic_vision.pdf

5. UK Department for Science, Innovation and Technology, 'Spectrum Statement' (2023) https://www.gov.uk/government/publications/spectrum-statement/spectrum-statement

6. National Telecommunications and Information Administration, 'National Spectrum Strategy' (2023) https://www.ntia.gov/programs-and-initiatives/national-spectrum-strategy

7. Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Mobile Black Spot Program Evaluation Report' (2022)

8. Based on industry data collected and provided by AMTA

9. Brady, V. (10 September 2025). A shared national vision for Australia's digital future [Speech transcript]. Telstra Exchange. https://www.telstra.com.au/exchange/national-press-club-speech--a-shared-national-vision-for-austral

10. Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Mobile Black Spot Program' https://www.infrastructure.gov.au/media-communications/phone/mobile-services-and-coverage/mobile-black-spot-program

11. Deloitte Access Economics, 'Connected Nation' (2019) https://www.austelco.org.au/wp-content/uploads/2025/06/Connected-Nation-Jan-2020-Web.pdf

General use restriction

This report is prepared solely for the use of the Australian Mobile Telecommunications Association. This report is not intended to and should not be used or relied upon by anyone else and we accept no duty of care to any other person or entity. The report has been prepared for the purpose of assessing the broader economic and social role of mobile for Australia's future and the policy and regulatory settings related to the mobile telecommunications sector. You should not refer to or use our name or the advice for any other purpose.

Deloitte.

Deloitte Touche Tohmatsu
Quay Quarter Tower,
50 Bridge St,
Sydney NSW 2000

+61 2 9322 7000
www.deloitte.com.au

Deloitte Access Economics is Australia's pre-eminent economics advisory practice and a member of Deloitte's global economics group. For more information, please visit our website: www.deloitte.com/au/deloitte-access-economics