AMTA

Australian Mobile Telecommunications Association

27 March 2026

AMTA Submission to the Senate Select Committee on Productivity in Australia

The Australian Mobile Telecommunications Association (AMTA) is the peak industry body of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians.

AMTA members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

AMTA welcomes the opportunity to provide this submission to the Senate Select Committee on Productivity in Australia.

If you have any queries or comments in relation to the content of our submission, please contact Chris Coughlan, Head of Spectrum and Network Infrastructure on +61 (0) 401 988 322 or by email chris.coughlan@amta.org.au.

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AMTA Submission to the Senate Select Committee on Productivity in Australia

The Australian Mobile Telecommunications Association (AMTA) is pleased to make this submission to the Senate Select Committee on Productivity in Australia. AMTA is the peak national body representing Australia's mobile telecommunications industry. AMTA members include mobile network operators and service providers, mobile phone and device manufacturers, retail outlets, network equipment suppliers and other suppliers to the industry. We are committed to delivering positive change for a mobile-enabled future for all Australians.

Mobile connectivity is now central to the way Australians live, work, and play. The mobile sector forms the backbone for digital applications and services that drive national productivity and transformation, as well being indispensable to the daily lives of most Australians. Digital applications and new technologies such as AI and cloud computing do not work without the latest upgrades to the underlying mobile technology and Australian businesses and consumers cannot benefit from these without connectivity.

The Inquiry provides a valuable opportunity to strengthen the national policy and regulatory settings that drive productivity in our country. It is essential the for the inquiry to recognise the relationship between mobile networks, digital infrastructure, technology, innovation, skills and cyber and their contribution to the broader economy. It is clear the mobile telecommunications industry has a key role to play in unlocking new productivity gains through providing the advanced mobile connectivity and digital infrastructure our economy will need to remain competitive now and in the future.

However, regulatory complexity is currently keeping mobile infrastructure rollouts gridlocked, with development approval alone for new telecommunications facilities taking an average of 211 days. If those approval timeframes were reduced by even 25%, industry would be able to deliver between 150 and 200 additional mobile site projects each year.

The mobile sector has also experienced long term declines in returns on invested capital, indicating a reduced capacity to invest in infrastructure to meet growing connectivity demands. It needs to be recognised that spectrum costs do impact future investment and industry sustainability. This is a concern of strategic national importance – as for Australia to realise the productivity benefits of transformative technologies like AI, we require a foundation of secure and reliable telecommunications connectivity which in turn requires ongoing investment.

Recently, AMTA commissioned Deloitte Access Economics (Deloitte) to identify policy recommendations that would help the mobile sector to drive Australian productivity improvements. Deloitte Access Economics produced a report "Future of Mobile: Reforms to modernise Australia's telecommunications", which was launched on 10 March 2026 at a function at Parliament House.

A key finding is that a 10% reduction in regulatory complexity currently weighing down the mobile sector would provide $150 million in annual productivity gains, freeing up resources for innovation

and improving consumer and business outcomes. Faster, nationally consistent planning processes and better coordination will help accelerate deployment, close blackspots and strengthen redundancy in disaster-prone regions.

The six key reforms in the report are:

- Establishing a national Digital Infrastructure Coordinator General to support streamlined governance to accelerate deployments and help coordinate strategic and statutory planning.
- Creating a harmonised planning framework with adoption incentives for local councils, to reduce fragmentation and accelerate digital infrastructure rollout nationally.
- Amending Schedule 3 to the *Telecommunications Act 1997* (the **Act**) to adopt a risk-based approach, with a fast-track to unlock low-impact builds and accelerate capacity.
- Developing a National Spectrum Strategy to to provide investment certainty, drive efficient allocation, and secure Australia's 6G future.
- Creating targeted planning and land access relief for government co-funded sites - to unblock critical black spot builds and deliver coverage faster.
- Implementing an industry-led process for streamlining the Act over time - to progressively simplify and future proof the Act.

An infographic summary of the full Deloitte report is attached to our submission.

Our submission outlines the goal of each policy recommendation and how it aligns with the Committee's Inquiry ToR and Discussion Paper.

We hope our submission assists the Committee with its work.

Content

Introduction

As artificial intelligence and data-driven technologies fundamentally reshape how Australians access services and participate in the economy, mobile networks must evolve to support the persistent, high-capacity, and low-latency communication these technologies demand and also cope with continued growth in data demand. Telecommunications reform to support this evolution must become a national priority if Australia is to unlock the productivity gains and economic growth it seeks.

The benefits of prioritising reforms to modernise Australia's current fragmented policy and regulatory settings for digital infrastructure are clear: more reliable digital services, improved safety outcomes and better access to health, education and work.

Taking the health sector as an example, digital practices and tools are already well-incorporated into the sector. Telehealth and online health records already feature in everyday practice. As technology continues to advance, the health sector will only become more digitalised, with patient monitoring, analysis, and administration being affected by this change.

AMTA's Future of Mobile infographic on Health recorded that the market for global healthcare virtual assistants grew by around 45% in 2024, with voice driven reminders, appointment scheduling, and medication alerts via mobile all increasing in use. As technology evolves in its use, only businesses which are supported with strong telecommunications infrastructure will be able to take advantage of these new tools.

The same can be seen in the construction industry, with mobile technology ensuring workers are connected and efficiently updated on-site. As mobile technology and drones are increasingly used to map construction sites, live updates for safety and design will only be accessible across sites with access to mobile coverage.

For both sectors, these new tools will remain elusive, especially in regional Australia, unless the required mobile infrastructure is invested in. However, regulatory burden and obstruction currently prevent this from being a certainty across Australia, and if it remains the case, lost opportunities for boosting productivity through widespread diffusion of emerging technologies are likely to continue.

The below recommendations seek to ensure that Australia, in its entirety, can enjoy the productivity benefits of mobile technology that will arise from better connectivity and emerging digital technologies. A Digital Infrastructure Coordinator General (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 the Deloitte report could deliver a range of benefits to communities, government and the telecommunications sector. Deloitte's analysis concluded that when implemented they include:

- Accelerating the development of an additional 150 to 200 mobile sites, improving coverage to 180,000 to 250,000 people sooner each year, bringing forward up to $160 million worth of connectivity improvements
- Up to $430 million in additional telecommunication infrastructure expenditure as a result of a modernised approach to regulating telecommunications.

- A 10% reduction in regulatory complexity through national consistency would provide $150 million in annual productivity gains, freeing up resources for innovation, improving consumer outcomes and businesses' financial sustainability.

Establishing a national Digital Infrastructure Coordinator General to drive reform

Parts of government can sometimes work in isolation, leading to regulatory duplication and jurisdictional policy incompatibility. Many jurisdictions do not operate at best practice, contributing to the average time to secure development approval for new telecommunications infrastructure being approximately 211 days, and limitations on access to suitable land, including Crown land. This prevents families, communities, businesses, schools and other organisations from enjoying the benefits of stronger mobile connectivity. It also artificially and arbitrarily inhibits access to productivity gains that would have materialised through greater mobile connectivity.

A Digital Infrastructure Coordinator General (DICG) would allow telecommunications planning expertise to be centralised in one office to provide strategic oversight over Australia's telecommunications infrastructure policies. Sitting within the Department of Communications (DITRDCSA), it would streamline and harmonise regulatory processes and increase transparency and accountability in infrastructure delivery. This would simplify approvals processes and unify regulations across jurisdictions. The DICG's remit should also extend to improving land access, including efficient access to Crown land. This should include assisting government establish principles for non-discriminatory Crown land access, such as removing co-user fees that discourage site sharing and investment in marginal areas.

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. It would also foster a more unified national approach to digital infrastructure, helping states and territories to embed consistent guidance into their planning frameworks.

The Federal Permitting Improvement Steering Council in the United States is an international example of such a concept being used to oversee the approval of broadband and data centres. The Council has reduced the average time to complete an environmental impact statement by two years[1].

Deloitte conclude a DICG could:

- Help improve coverage gaps for 180,000 to 250,000 Australians each year and reducing blackspots in disaster-prone regions.
- Unlock up to $160 million in new infrastructure investment annually by accelerating approvals and cutting delays.

Creating a harmonised planning framework with adoption incentives for local councils

Many of the 537 local governments across Australia face material resourcing constraints and operate within regulatory and accountability frameworks that may incentivise risk-averse decision-making. Coupled with a patchwork of inconsistent regulation, manifesting in different rules, artefact preparation, and varying approval timeframes, these elements can significantly hold back deployment of telecommunications facilities across Australian communities.

A national planning code would ensure uniform definitions, standards, zoning principles, and assessment pathways across all jurisdictions. Consistent approval requirements, data requirements, national minimum standards, and a consistent set of requirements applicable to Crown, private, and public land would also be included in the code.

This can lead to opportunities for policy reform and alignment being constrained due to a jurisdiction's internal constraints. However, the provision of targeted incentives for local councils to adopt the national planning code would assist in its uptake and reward early adopters. The cost of regulatory transition would decrease for local councils, as councils who adopt the code quickly are rewarded for being proactive.

The United States provides two examples of this policy strategy. The Federal Communications Commission has implemented rules by interpreting the Federal Communications Act to make it easier to deploy wireless and broadband in 2018[2,3]. The US Permitting Council Executive Director also can transfer funds to agencies and governments to facilitate timely and efficient approvals[4].

For carriers investing in the rollout of telecommunications infrastructure, a uniform national code would greatly lower costs and reduce the time spent on navigating complex regulation that differs from one council to the next. This approach delivers immediate productivity gains and embeds lasting reform as councils adopt common standards, while locking in enduring reform through the adoption of consistent, nationally aligned standards by councils.

AMTA's previous submissions to the Productivity Commission and the Treasurer's 2025 Economic Reform Roundtable listed the harmonisation of network deployment obligations across jurisdictions as in the national interest and key to reducing regulatory burden.

Deloitte advise that a national planning framework could:

- Raise $430 million in additional annual infrastructure expenditure.
- Produce productivity gains across multiple jurisdictions by increasing regulatory efficiency.

Amending Schedule 3 to the Act to adopt a risk-based approach

Schedule 3 to the Act grants telecommunications carriers statutory powers to enter land, inspect the land, install a limited range of telecommunications facility (known as low-impact facilities) and to maintain a range of telecommunications facilities subject to well defined regulatory guardrails.

However, recent Federal Court interpretation of clause 7(3)(e) of Schedule 3 to the Act has limited the utility of how a carrier can maintain a telecommunications facility. Combined with varying State-based regimes, environmental and heritage approvals processes, these factors have significantly constrained the Schedule's effectiveness.

Amending Schedule 3 to the Act is now a necessity and so achieve the following:

- Clarify maintenance provisions to confirm installing an additional unrelated facility within an existing facility under clause 7(3)(e) of Schedule 3 constitutes a maintenance activity.
- Clarify that replacement facilities should not exceed the visual apparent volume of the existing facility by amending subclause (75)(c)(ii) to allow like-for-like replacements 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.
- 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.
- Codify restoration standards, adopt model access agreements, and undertake periodic reviews to improve consistency and keep the framework current.

These amendments will ensure the Act is once again fit for purpose, providing carriers with the regulatory certainty needed to continue investing in the telecommunications infrastructure that underpins a dynamic and resilient economy.

Consistent with the Productivity Commission and the Treasurer's 2025 Economic Reform Roundtable, these reforms will lower deployment delays and improve investment certainty, delivering productivity gains through faster infrastructure rollout, improved service resilience and restoration after an outage or emergency, and more timely network upgrades for communities and businesses.

Developing a National Spectrum Strategy

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. Examples include those of key international counterparts like the United States' National Spectrum Strategy and the United Kingdom's cross-government spectrum statement[5,6].

In Australia, the lack of a clear, holistic long-term vision limits the degree to which all industries that rely on spectrum can efficiently allocate resources, resulting in the loss of productivity gains that would come with broader planning and foresight.

AMTA's previous submissions to the Productivity Commission called for transparency regarding spectrum policy to ensure long-term industry investment and sustainability. An Australian Government National Spectrum Strategy ("the Strategy") would lay out the role spectrum should play across our economy in future to help meet national economic, productivity, security and social aims. It would need to respect the claims of different use cases while also distinguishing between them according to a set of agreed national priorities. The Strategy would establish clear allocation,

licensing, and reassignment plans, ensuring Australia uses spectrum to efficiently lead emerging technologies such as AI. This would help promote both Australian investment and innovation. The Strategy would also allow security and sovereignty considerations to be prioritised.

While the ACMA's technical regulatory independence for spectrum management would be maintained, a long-term National Strategy designed with input from the ACMA, industry, Government and other stakeholders would ensure overarching alignment with national productivity policy priorities.

Spectrum certainty would ensure long-term investment into infrastructure and advanced technologies by the private sector. Australia would be able to enjoy the greater connectivity and productivity benefits that come from long-term investment and planning.

A national spectrum strategy could:

- Ensure greater access to the latest technologies, facilitated by spectrum planning and allocations, that will drive productivity and social benefits.
- Unlock investment, drive innovation, and reduce the risk of bottlenecks as demand for emerging technologies like AI surge.

Creating planning and land access exemptions for government co-funded sites

Telecommunications site approvals are frequently delayed or blocked by local planning processes, even in communities actively campaigning for improved coverage. Delays mean less government funding to mobile 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. More importantly, it sees communities waiting to receive connectivity upgrades and certainty, which can contribute to health and safety risks in the case of an emergency.

Adopting targeted planning exemptions for prioritised, government co-funded areas (such as the Peri-Urban Mobile Program or the Mobile Black Spot Program) would streamline approvals, seeing projects deployed faster and communities given the digital connectivity they need.

This requires a clear legal process for ministerial step-in powers to approve a site when there is clear public interest, overriding local rejections. Targeted planning exemptions for co-investment sites will accelerate infrastructure rollout, reduce regional service gaps, and deliver faster, fairer access for communities.

Communities across Australia, from the city to the regions would see mobile blackspots and areas of high priority receive the mobile connectivity they deserve. In turn, this would yield productivity and safety benefits for consumers, all while efficiently using taxpayer funds.

Deloitte in their report advise that creating planning and land access exemptions could:

- Provide critical mobile coverage and upgrades between 25% to 50% sooner, closing persistent blackspots and supporting safety, education, and local economies.

- Reduce project timelines and cut through red tape that has stalled over 170 sites nationwide.
- Ensure value for taxpayer funds.

Implementing an industry-led process for streamlining the Telecommunications Act (1997) over time

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.

Establishing a process for streamlining the Act with clear governance, a firm mandate, and a fixed timeline for delivery would simplify and future-proof the Act. Led by industry to benefit from our collective wisdom of operating under the current Act over the past 30 years, the process would:

- Prioritise amendments that yield the highest productivity gains.
- Unite stakeholders, industry and government through an open, iterative consultation process. This would involve industry, communities, councils, and safety agencies.

By prioritising high-value changes, this process would concentrate reform effort where approval times and industry costs can be reduced most effectively. Iterative consultation and published impact analysis would provide transparency and legal certainty, increasing investor confidence and reducing unintended consequences.

This would see Australia deploy telecommunications infrastructure more quickly, saving carriers from extensive costs from red tape and allowing the Government to reap the productivity gains that come with faster, more efficient deployment.

Implementing the modernization of the Act could:

- Ensure faster infrastructure rollouts and lower costs.
- Cut compliance costs and free up resources, helping shift thousands of hours from red tape to building better networks and unlock up to $150 million in annual productivity gains.

As per AMTA's previous submissions to the Productivity Commission, an early win would involve key regulatory bodies (ACMA, ACCC, DITRDCSA, etc) being required to articulate a forward-looking program of all regulatory initiatives that affect the telecommunications sector, updated bi-annually – to help reduce the accumulation of additional regulation holding back productivity enhancing mobile sector investments and deployments.

Conclusion

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.

AMTA is committed to working collaboratively with government to ensure mobile connectivity is a pillar of productivity reform in Australia. We thank the Committee for the opportunity to contribute and would welcome the chance to appear at a public hearing to expand on our submission.

References

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2. 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).
3. 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).
4. Federal Permitting Improvement Steering Council Permitting Council), 'Our Mission & What We Do' (https://www.permitting.gov/about/our-mission).
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

Telecommunications is an essential enabler of Australia's modern economy

33%
growth in mobile data

Mobile is an essential enabler of the digital economy. Usage is growing with mobile data downloads increasing by 33 per cent in 2022-23 alone.

$27 billion

Deloitte Access Economics modelling undertaken in 2022 finds that being a global leader in advanced mobile connectivity would unlock Australia's productivity.

Regulatory barriers and planning delays are holding back investment needed for full connectivity

537
local councils

There are 537 local councils in Australia, which exacerbates a fragmented system of regulatory instruments across all levels of government.

211
days

The time to secure development approval for a new telecommunications facility is approximately 211 days across the nation.

3+
years

The median delivery timeframe for mobile blackspot solutions is three years. However, many projects take closer to four or five years.

Six practical policy recommendations for reform

Immediate opportunities

1. Establish a Digital Infrastructure Coordinator General
2. Create a harmonised planning framework with adoption incentives
3. Amend Schedule 3 of the Act* to adopt a risk-based approach

Long-term reforms

4. Develop a National Spectrum Strategy
5. Create planning and land access exemptions for government co-funded sites
6. Implement a process for streamlining the Act* over time

Better mobile regulation means faster deployments, stronger investment in future ready networks and greater productivity benefits

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

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

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Findings have been drawn from *Future of Mobile: Reforms to modernise Australia's telecommunications* prepared by Deloitte Access Economics and published in March 2026.

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