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Australia New Zealand Policing Advisory Agency

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THE COUNCIL OF AMBULANCE AUTHORITIES

7 January 2011

Senator Stephen Conroy
Minister for Broadband, Communications and the Digital Economy
Parliament House
CANBERRA ACT 2601

Dear Senator Conroy,

We are writing to you in the interests of community safety and the safety of the nearly 350,000 ambulance, fire, police and state emergency service personnel across Australia to strongly request that you enable the provision of a dedicated 20 MHz (2x10MHz paired) allocation within the freed-up 126 MHz of the 700 MHz Digital Dividend to public safety agencies.

We are concerned that currently the Australian Media and Communications Authority (ACMA) and the Department of Broadband, Communications and the Digital Economy (DBCDE) are not proposing to reserve any of the 700 MHz Digital Dividend for public safety agencies to ensure sufficient broadband data networks exist to support the critical business needs of emergency services.

In our view, the suggestion that public safety agencies requiring access to the 700 MHz band can enter into commercial arrangements with the major carriers of communications services in that band does not fully recognise how community safety is delivered both during major emergencies (e.g. bushfires, floods, terrorist incidents, etc), major events (e.g. New Years Eve, CHOGM) and on a daily basis. Commercial provision can not and would not be able to account for our needs as they are not dimensioned to meet critical requirements especially during high use periods (e.g. New Years Eve celebrations in capital cities) when their services can congest to the point of failure.

The ACMA Discussion Paper (*Spectrum reallocation in the 700 MHz digital dividend band)* recommends all available spectrum be allocated to the highest bidders through an auction process in the second half of 2012. In our view, this compromises the public interest and community safety for a financial dividend. It has the potential to undermine fully effective communication and interoperability between emergency service agencies at a time when recent Royal Commissions, coronial investigations and other significant public inquiries have examined communication issues within and between emergency services in detail. Aside from the risk to life, we are concerned that this proposal, should it be implemented, will provide fertile ground for future inquiries to criticise emergency service agencies and government at all levels.

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European and United States standards agencies are targeting the 790-862MHz band for public safety broadband communications. These two markets will drive equipment research and investment by manufacturers and, for these reasons, it is essential that Australia is aligned with the public safety frequency allocation in these jurisdictions.

We urge you to allocate sufficient 700 MHz spectrum, consistent with the frequency ranges that have been requested in the USA and Canada (and proposed in Europe), to ensure emergency services can deliver their essential services without being beholden to, or compromised by, the vagaries of commercial providers.

Yours sincerely,

Jon White
Chief Executive Officer
Australia New Zealand Policing Advisory Agency

Naomi Brown
Chief Executive Officer
Australian Fire Authorities and Emergency Service Authorities Council

Lyn Pearson
Executive Director
Council of Ambulance Authorities