



Police Federation of Australia

The National Voice of Policing

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The Hon Malcolm Turnbull MP
Minister for Communications
Parliament House
CANBERRA ACT 2600

Dear Minister

SPECTRUM FOR PUBLIC SAFETY AGENCIES

The Police Federation of Australia, representing the nation's 58,000 police officers, wrote to you on 12 February 2014 regarding spectrum for public safety. We are yet to receive a reply.

In the meantime, your Blog of 3 April headed *Mobility Drives Productivity* has come to our attention. The ACMA study of the impact of mobile broadband on the nation's productivity is impressive as you point out. We expect that productivity improvements from mobile broadband use by Australia's police services, firefighters, ambulance and emergency services, and by extension, law enforcement and public safety would be even more dramatic. As these are essentially mobile frontline services, the productivity gains are projected to be substantial, and the gains for public safety are likely to be transformative.

A recent case in point is the initial 500 Apple iPad minis rolled out in the Queensland Police Service in advance of the Brisbane G20 meeting of world leaders. Using these devices, mobile access to key databases is now available. According to Queensland Police Minister Jack Dempsey "The new mobile solution is saving officers up to 30 minutes each shift in desk time.....which equated to over 1000 desk hours per week"

<http://www.itnews.com.au/News/381562,qld-police-wins-funding-to-extend-ipad-rollout.aspx>

Given that your Government foreshadowed a cost benefit analysis (CBA) into provision of 20 MHz of spectrum for public safety agencies in your pre-election undertaking to the PFA, we expected that this would be well underway by now. Since this issue has been on the national agenda for almost three years, the PFA urges swift action on the CBA.

We provided a May 2013 cost benefit analysis by Professor Ure of the University of Hong Kong covering eight Asia-Pacific countries including Australia with our previous letter to you. In each case the CBA was positive, including for 20MHz for public safety in Australia.

Since that time Dr Alexander Grous, Centre for Economic Performance, London School of Economics and Political Science produced a December 2013 cost benefit study in Europe. Grous looked at the Socio-Economic Value of Mission Critical Mobile Applications for Public Safety in the EU. He looked at 10 countries across Northern, Central and Southern Europe. His process estimated an annual consolidated value of between €20.9 billion and €34 billion is derived if 20MHz is allocated as opposed to a one off economic gain of €3.7 billion if the spectrum was auctioned.

Grous's other study looked at the UK where he estimated an annual consolidated socio-economic value of around £5 billion from the use of 2x10 MHz in the 700MHz band for public safety in the UK as opposed to the opportunity cost of the alternative sale of this spectrum at auction which could yield a one off economic gain for the Government ranging from £300 million to £1.1 billion. See links to each report:

http://eprints.lse.ac.uk/56319/1/_lse.ac.uk_storage_LIBRARY_Secondary_libfile_shared_repository_Content_Grous_Grous_Socioeconomic_Value_Mission_2013_author.pdf
<http://www.tandcca.com/Library/Documents/Broadband/LSE%20PPDR%20UK.pdf>

On the basis of these and other analyses to date, it seems clear that there is ample evidence of the substantial benefit to society of the commitment of 20MHz of spectrum for use by public safety agencies over and above additional sale of spectrum to telecommunications companies.

The “fundamental questions” you raise about public safety mobile broadband in your Blog overlook a number of critical matters:

- The maximum geographic coverage of Australia by the telecommunications company with the largest footprint is 30% of the country, less than the police services coverage through their extensive existing radio networks; and
- It is not necessary for the public safety agencies to build an entirely new network; they would enhance their existing substantial radio networks including their towers and related infrastructure for a mobile capability.

Leaving those questions aside, we are sure you are aware that the *Radiocommunications Act 1988* says:

“The object of this Act is to provide for management of the radiofrequency spectrum in order to:

- (a) maximise, by ensuring the efficient allocation and use of the spectrum, the overall public benefit derived from using the radiofrequency spectrum;

(b) make adequate provision of the spectrum:

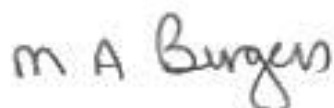
(i) for use by agencies involved in the defence or national security of Australia, law enforcement or the provision of emergency services”

This is a very unusual section of the Act, the history of which your department can no doubt provide. We note that the Act does not simply require the Government and the ACMA to **have regard** to the needs of defence, national security, law enforcement and emergency services. Nor does it suggest providing spectrum to third parties like Telstra so that they can service the needs of law enforcement and emergency services. It requires **adequate provision of the spectrum for use by law enforcement and emergency services**.

In summary, the Federal Government, and its agency the ACMA, have a legal obligation to provide adequate spectrum for these essential public safety purposes. We intend to hold the Government to that obligation and we are advised that we have the necessary standing to pursue this vital matter.

In order to achieve mobile broadband capacity for public safety, which has been a matter of extended public debate, we would appreciate an opportunity to meet with you at your earliest convenience.

Yours sincerely

A handwritten signature in black ink that reads "m A Burgess". The signature is written in a cursive, lowercase style.

Mark Burgess
Chief Executive Officer

Cc: Minister for Justice, Michael Keenan