



Allocation limits advice for 3.4–4.0 GHz band allocation in remote areas

Consultation Paper

August 2021

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1. Introduction

The Australian Communications and Media Authority (ACMA) is currently planning to release spectrum in the 3.7–4.0 GHz and 3.4 GHz bands via a range of licensing arrangements. This process will make a large amount of spectrum available in the 3.4–4.0 GHz band across Australia for various uses.

As part of this process, the ACMA plans to allocate 600 MHz of spectrum in the 3.4–4.0 GHz band in remote areas of Australia in the first half of 2022. New assignments in this spectrum band will be made available as area-wide apparatus licences.¹ The ACMA is currently considering assigning these licences via an administrative process.

Under the *Radiocommunications Act 1992*, the ACMA is able to impose statutory limits with respect to the issue of licences.² Before doing so, the ACMA must consult with the Australian Competition and Consumer Commission (ACCC) on the need for allocation limits, and the nature of any such limits.³

On 6 August 2021, the ACMA wrote to the ACCC on whether allocation limits should be imposed on the administrative issue of apparatus licences in the 3.4–4.0 GHz band in remote Australia, and if so, what these limits should be.

In particular, the ACMA is interested in the ACCC's advice on whether allocation limits might be appropriate to mitigate risks to competition at a local level posed in two scenarios:

- if a party were to seek to acquire the entire 600 MHz, or a significant proportion of the available spectrum in a given area or location to withhold from competitors, and for the purposes of obtaining greater revenues in the downstream market; and
- localised areas where competing demand for the spectrum may exceed the available supply, for example, at mine sites, transport corridors and hubs, and potentially some towns.

The ACMA has asked that the ACCC provide its advice by 29 October 2021.

¹ For more information on area wide apparatus licences, see: <https://www.acma.gov.au/publications/2020-02/guide/area-wide-licensing-acma-approach-introducing-area-wide-licences>.

² Subsection 102G(1) of the *Radiocommunications Act 1992*.

³ Subsection 102G(6) of the *Radiocommunications Act 1992*.

2. Consultation process

This consultation paper seeks feedback to inform the ACCC's preparation of advice to the ACMA about appropriate allocation limits to apply to the allocation of the 3.4–4.0 GHz spectrum in remote areas.

The ACCC has included a number of issues for comment throughout this paper and provided a consolidated list of questions at **Appendix A**.

The ACCC will accept submissions from interested parties until **5pm, Friday 24 September 2021**. Submissions received after this time may not be given due consideration.

Submissions should be sent to:

- Chris Xie, Director, Mobiles and Consumer Engagement, Infrastructure Division, ACCC (chris.xie@accc.gov.au), and
- Paul Dempster, Mobiles and Consumer Engagement, Infrastructure Division, ACCC (paul.dempster@accc.gov.au)

The ACCC will consider all submissions as public submissions and will post them on the ACCC's website. If you wish to submit commercial-in-confidence material, please submit both a public and a confidential version of your submission. The confidential version should clearly identify commercial-in-confidence material and the public version should clearly identify where commercial-in-confidence material has been removed. All submissions will be published on our website.

The ACCC has published a guideline setting out the process parties should follow when submitting confidential information to the ACCC. The ACCC Information Policy June 2014 sets out the general policy of the ACCC on the collection, use and disclosure of information. A copy of the guideline and policy are available on the ACCC's [website](#).

3. The ACCC's approach to this advice

Under the *Radiocommunications Act 1992*, the ACMA is able to impose statutory limits on the aggregate amount of spectrum that may be used by any party as a result of a specific allocation (allocation limits). Before doing so, the ACMA must consult with the ACCC on the need for allocation limits, and the nature of any such limits.⁴

The ACMA has written to the ACCC seeking advice on the need for allocation limits. In its letter of request, the ACMA noted that its decisions for allocation processes will be guided by the Object of the *Radiocommunications Act 1992*, which is to promote the long-term public interest derived from the use of the spectrum by providing for the management of the spectrum in a manner that:

- (a) facilitates the efficient planning, allocation and use of the spectrum; and
- (b) facilitates the use of the spectrum for:
 - (i) commercial purposes; and
 - (ii) defence purposes, national security purposes and other non-commercial purposes (including public safety and community purposes); and
- (c) supports the communications policy objectives of the Commonwealth Government.

In considering the request for advice, the ACCC proposes to have regard to the criterion of promoting the long-term interests of end-users (LTIE), by promoting competition in downstream markets, and encouraging efficient investments in, and use of, infrastructure.⁵

The ACCC considers that this criterion is consistent with the object of promoting the long-term public interest derived from the use of the spectrum. In this regard, the ACCC notes that the considerations around facilitating the efficient use of spectrum are intended to include competition considerations, particularly in downstream markets.⁶

A key question that the ACCC asks when assessing the impact of the allocation on competition is whether the failure to acquire spectrum in the allocation would constrain a party's ability to compete effectively in the relevant markets. In order to assess the state of competition in the relevant markets, the ACCC seeks first to understand the services that are likely to be deployed using the spectrum available in the allocation, and to identify the downstream markets that rely on the spectrum to be allocated. The ACCC will then examine the state of competition within those markets in order to assess whether allocation limits are needed to promote competition in those markets.

The ACCC is seeking views from stakeholders on these matters, and other factors that might be relevant to its consideration of the need for allocation limits.

⁴ See subsections 60(5), 60(13A), 102G(1) and 102G(6) of the *Radiocommunications Act 1992*.

⁵ See ACCC advices on spectrum allocation in the 26 GHz band and the 850 MHz expansion and 900 MHz bands at: <https://www.accc.gov.au/regulated-infrastructure/communications/mobile-services/spectrum-competition-limits>. In providing these advices, the ACCC was also asked to have regard to the relevant communications policy objectives for specific allocations.

⁶ Explanatory Memorandum for Radiocommunications Legislation Amendment (Reform and Modernisation) Bill 2020, p. 20.

4. Potential use of, and demand for, 3.4–4.0 GHz spectrum in remote areas

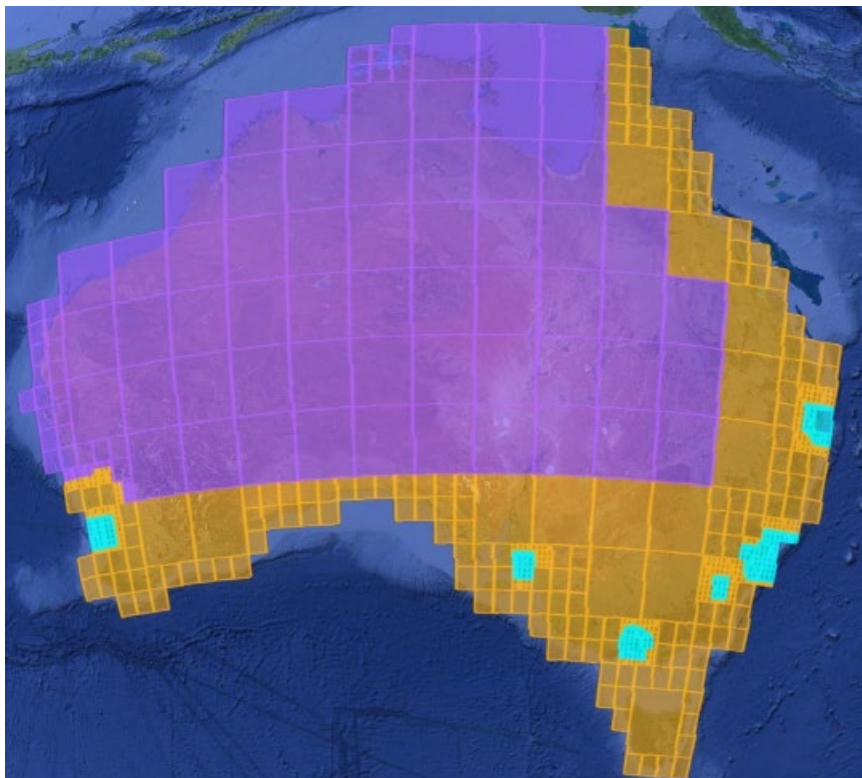
The 3.4–4.0 GHz band has been internationally harmonised for use by 4G and 5G technologies. The ACMA has previously identified the 3.6 GHz band as a pioneer band for 5G services when allocating spectrum licences in metro and regional areas in that band in 2018.

The ACMA has decided to make spectrum in the 3.4–4.0 GHz band available for a range of uses, including for the provision of wide area wireless broadband (WA WBB), local area wireless broadband (LA WBB) and private network deployments. The band will also continue to be available for incumbent uses, such as point to point (PTP) fixed service links, and fixed satellite service (FSS) earth receive stations.

In addition to continuing demand from incumbent services, the ACCC considers there could be new demand for the spectrum from a range of operators for the purposes of deploying wireless broadband services. For example, the spectrum could be used by the mobile network operators to provide mobile services using WA WBB, by smaller wireless internet service providers (WISPs) to provide localised fixed wireless services, or by operators or enterprises to deploy private networks.

The figure below shows the indicative geographic areas covered by the remote licences.

Figure 1 Indicative map of geographic areas for 3.4–4.0 GHz band (remote areas are purple, regional areas are orange, metropolitan areas are blue)



The remote licences cover a large proportion of the Australian land mass, and it is likely that demand will be more concentrated in populated areas, or significant economic sites such as mine sites, transport corridors and commercial hubs. It is also likely that demand for the

spectrum will differ across the geographic areas covered by the licences, depending on the types of deployment and services to be provided.

The ACCC understands that there may be entities that wish to acquire spectrum but do not plan to deploy services using the spectrum. Instead, these entities may provide access to the spectrum to downstream users who then deploy the infrastructure that uses the spectrum. The ACCC understands that this is more likely to occur in areas such as mine sites.

Given that there is a substantial amount of spectrum available across the remote areas, it is important that the ACCC identify areas where demand may exceed supply in order to assess whether competing demand gives rise to any competition issues. We would appreciate any views of stakeholders on the level of demand in certain areas.

The ACMA is yet to determine the form of administrative process for the issue of licences in the remote area. The ACCC understands that the ACMA is considering the use of a 'first-in-time' format, as well as the potential use of an 'application window' in the beginning of the process.⁷ We would be interested in stakeholder views on the impact of the format of the assignment process on likely demand for the spectrum.

In addition, the ACMA has not determined the licence duration for the apparatus licences to be assigned under this process. Under the *Radiocommunications Act 1992*, the ACMA can issue apparatus licences with a licence term of up to 20 years,⁸ although the ACMA has indicated that a medium-term licence duration of up to 10 years could be suitable where there is a high number of users and mixed uses.⁹ We would be interested in stakeholder views on the impact of licence duration on likely demand for the spectrum.

Issues for comment:

- 1. What are the likely intended uses of 3.4–4.0 GHz band spectrum in remote Australia?**
- 2. If you intend to acquire the spectrum to deploy wireless services:**
 - (a) In what geographic areas do you intend to use the spectrum?**
 - (b) Do you expect your intended use is likely to change in the future? If so, please provide examples of how that might change.**
 - (c) What do you consider is the optimal allocation of 3.4–4.0 GHz spectrum to support your likely intended uses? What is the minimum allocation necessary?**

⁷ Under a 'first-in time' format, licences are issued to the first compliant application. Under an 'application window' format, applications are accepted for a fixed period, followed by an assessment of whether there are any applications competing for an overlapping area in the same frequency range. Competing applications will move to the second stage in which the competing spectral demand will be resolved. Once these initial rounds are completed, the issue of AWLs will revert to a first-in-time basis for administrative apparatus licence allocations.

⁸ Subsection 103(3) of the *Radiocommunications Act 1992*.

⁹ See ACMA, *Our approach to radiocommunications licensing and allocation – Implementing the Radiocommunications Legislation Amendment (Reform and Modernisation) Act 2020*, March 2021, p. 15.

(d) Is your demand for the spectrum for current use, or more likely to arise in the future?

3. Is there likely to be demand for the spectrum from entities that do not propose to use the spectrum but rather, intend to provide access to the spectrum to other users? If so, what is the extent of demand from these entities and in what geographic areas?

4. How is demand likely to be impacted by the:

(a) apparatus licence arrangements;

(b) likely format of the administrative assignment process; and

(c) licence duration?

5. Relevant downstream markets

In considering its advice, the ACCC examines the impact that the allocation would have on competition in the relevant downstream markets. Defining relevant downstream markets is important to enable the ACCC to assess the extent to which parties interested in acquiring the spectrum compete in the provision of downstream services, as opposed to competing for spectrum at the allocation stage.

The ACCC has previously provided advice on the use of allocation limits where the relevant downstream markets were generally well defined and understood. The allocation of spectrum in the 3.4–4.0 GHz band in remote areas introduces some complexity in market definition due to potential demand from a range of users who may seek to use it for public or private network deployments. This means that there could be a number of distinct downstream markets that will be impacted by the allocation.

In addition, wireless networks are increasingly 'general purpose', meaning they are able to meet a wide range of use cases and serve a broad variety of downstream markets, via a unified technology standard. This means that the spectrum could be used for a single deployment that provides services in multiple downstream markets. In some areas such as mine sites or agricultural hubs, end-users can choose to be connected and acquire services via different models of network deployment, using the same spectrum.

Given the range of use cases and potential demand noted in Chapter 4, the ACCC considers that likely relevant downstream markets could include the national mobile services market, the fixed broadband market in certain geographic areas and the private wireless enterprise market. There may be other markets relevant to the provision of services by the incumbent users (i.e. those that deploy PTP and FSS services using spectrum in this band). However, it is unclear whether they operate directly in a relevant downstream market or provide intermediary inputs to a relevant downstream markets.

The ACCC is interested in stakeholders' views on the relevant downstream markets that are likely to be impacted by the 3.4–4.0 GHz band allocation in remote areas

Issues for comment:

- 5. What are the relevant downstream markets that are likely to be impacted by the 3.4–4.0 GHz band allocation in remote areas? Please clearly define the geographic dimensions of these markets, the providers of services and the end-users in these markets.**
- 6. Are there any relevant markets in which the services could be provided by different types of network deployment?**
- 7. Are there any relevant markets which consist of a single, or very small numbers of, end-user(s)?**
- 8. Are there likely to be future relevant markets that have not been identified?**

6. State of competition in relevant markets

To assess the state of competition, the ACCC generally considers a range of factors, including market concentration, demand and supply substitutes, price competition and the range and quality of services on offer. A key question that the ACCC asks is how the allocation will impact the ability of operators to compete in the relevant markets and whether any operator would be constrained from competing effectively in the markets if they do not have the opportunity to acquire sufficient spectrum in the allocation.

National mobile services market

The national mobile services market is dominated by the three MNOs, Telstra, Optus and TPG Telecom (TPG), who collectively account for 85 per cent of the market as at June 2020.¹⁰ The rest of the market (15 per cent as at June 2020) is served by mobile virtual network operators (MVNOs), which acquire wholesale services from the MNOs to provide retail services to end-users.

The national mobile services market is a market for similar but differentiated services, in which service providers compete over a range of price and non-price factors. As MVNOs rely on the MNOs' mobile infrastructure to provide services, their ability to compete on network-related features is limited. Instead, they compete on lower prices, and simpler and more flexible plan features to attract specific segments of the market.

On the other hand, network-related features such as geographic coverage, network quality including the roll out of new technology, such as 5G, are key factors of competition amongst the MNOs. In that respect, access to spectrum is critical to the MNOs' ability to compete, as it would impact the ability to expand coverage and capacity, and to roll out 5G technology across the country.

The 3.4–4.0 GHz band remote allocation could potentially provide the MNOs with access to additional mid-band spectrum in some areas within their mobile coverage footprint, such as in remote towns and along major transport routes. This additional spectrum would allow them to add capacity in those areas and could be used for 4G or 5G services.

In saying this, the extent to which the allocation could impact the ability of each MNO to compete in the national mobile services market is uncertain, given the MNOs' interests may be confined to limited, more populated areas. The MNOs' potential interest in using the spectrum for mobile services could also be influenced by the apparatus licensing arrangements, as they may have a preference for spectrum licences.

Fixed broadband market

Nationally, fixed broadband services are predominantly provided over the National Broadband Network (NBN) via a range of technologies. There are also small scale fixed networks that are used to provide fixed broadband services in specific geographic areas. Wireless networks could also be used to provide fixed broadband services within their coverage areas.

The allocation of spectrum in the 3.4–4.0 GHz band could potentially impact the fixed broadband market in a number of ways. For example, the MNOs could use the spectrum to provide 5G fixed wireless services in areas where they intend to roll out 5G coverage. Wireless ISPs could also use the spectrum to provide home internet services on a local

¹⁰ See ACCC, *ACCC Communications Market Report 2019-20*, December 2020, p. 31. Available here: <https://www.accc.gov.au/publications/accc-telecommunications-report/accc-communications-market-report-2019-20>

basis. This means the allocation could potentially enhance the ability of the MNOs and wireless ISPs to compete in the fixed broadband market in areas where they have coverage.

Private wireless enterprise market

A key aspect of the enterprise market is the provision of connectivity to industry for delivery of a range of services and applications. While the products and services in this market may be heterogeneous, they could potentially be considered substitutes by the end-user if they meet a particular need. As noted in Chapter 5, it is possible that the same downstream service (voice or broadband) could be provided via different deployment models.

For example, the site operator of a mine site could acquire connectivity to deliver voice, broadband or related services in a number of ways, including

- using mobile infrastructure deployed by an MNO;
- using a local wireless network deployed by a wireless ISP;
- using a private wireless network deployed by a third party or by the site operator itself.

The ACCC is interested in stakeholders' views on the degree of substitutability between the different deployment models as noted in the example above. We acknowledge however, that the degree of substitutability may depend on the specific industry use.

Issues for comment:

- 9. Do you have any views on the state of competition in the relevant downstream markets discussed by the ACCC?**
- 10. Are there any other markets that you consider relevant? How would the allocation of spectrum in the 3.4–4.0 GHz band in remote areas impact competition and investment in these markets?**
- 11. To what extent, if any, would licence duration impact competition and investment in these markets?**
- 12. For an industrial end-user in a remote area, are the deployment models substitutable? That is, would wide area wireless broadband be substitutable for local area wireless broadband? Would these services be substitutable for private LTE, or 5G networks?**

7. Current spectrum holdings and other allocations

The 3.4–4.0 GHz band in remote areas is currently used by a number of incumbent users, primarily fixed satellite and point-to-point services. There are limited existing holdings in this band in remote areas that could be used for the provision of wireless broadband services.

When assessing the need for, and nature of allocation limits, the ACCC has previously taken into account existing holdings in bands that are substitutable to the band subject to the allocation. The ACCC has done so in its advice to the Minister regarding the 3.6 GHz allocation in 2018, and the upcoming 850/900 MHz allocation.¹¹

The ACCC is interested in stakeholders' views on whether there are existing holdings in remote areas that are substitutable for the 3.4–4.0 GHz band in providing services in the relevant downstream markets. We are also interested to know whether this is the case across the remote area, or only in some areas.

The ACMA indicated that in remote areas, there are limited alternative apparatus-licensed mid-band spectrum options available that have been harmonised for 4G and 5G services. One band that has been internationally harmonised for 4G and 5G is the 1800 MHz band. The ACMA is reviewing apparatus licence arrangements for the 1800 MHz band in remote areas, which is currently administratively allocated. The ACCC is interested in stakeholders' views as to whether the availability of spectrum in the 1800MHz band should be taken into account in assessing the need for allocation limits for the 3.4–4.0 GHz band allocation in remote areas.

Issues for comment:

- 13. Do you consider that substitutable spectrum exists for the 3.4–4.0 GHz band in remote areas to enable the provision of services in the relevant downstream markets? If so, what spectrum do you consider to be a substitute?**
- 14. Does the availability of substitutable spectrum differ within the remote area?
Are there areas within the remote area, where no substitutable spectrum exists?**
- 15. Should the ACCC take into account the availability of spectrum in the 1800 MHz band in remote areas when assessing the need for allocation limits? If so, how?**

¹¹ See ACCC advices on spectrum allocation in the 3.6 GHz band and the 850 MHz expansion and 900 MHz bands at: <https://www.accc.gov.au/regulated-infrastructure/communications/mobile-services/spectrum-competition-limits>.

8. The need for allocation limits?

Allocation limits are important tools to ensure that spectrum allocations promote competition in downstream markets that rely on spectrum as an essential input. In certain circumstances, allocation limits can assist in maximising the public benefit derived from the use of spectrum.

In its request for advice, the ACMA notes two scenarios in which it seeks the ACCC's view on the appropriateness of allocation limits:

- 'if a party were to seek to acquire the entire 600 MHz (or a significant proportion thereof) of available spectrum in a given area or location in order to withhold from competitors, and for the purposes of obtaining greater revenues in the downstream market', and
- 'localised areas where competing demand for the spectrum may exceed the available supply, for example, at mine sites, transport corridors and hubs, and potentially some towns'.

While there is a relatively large amount of spectrum available (600 MHz across the remote area), demand is unlikely to be uniform across the remote area. Allocation limits may only be appropriate for localised areas where competing demand for the spectrum may exceed the available supply. In large parts of the remote area, it is likely that demand will not exceed supply and limits may not be required to address any competition concerns in those areas.

While allocation limits have been imposed in the past to address competition concerns in spectrum allocations where demand exceeds supply, they were typically applied to price-based allocation mechanisms, such as auctions. This is because in an unconstrained auction, the bidders may have incentives to acquire more spectrum than they need. This reflects the value they place on the spectrum includes both the value of using the spectrum, as well as the value of keeping their competitors from acquiring the relevant spectrum.

The ACMA is yet to decide on the form of administrative allocation method for the 3.4–4.0 GHz band allocation in remote areas. Statutory limits, in the form of an explicit *ex ante* limit that restricts the amount of spectrum a single party could acquire, have not been used for administrative allocations in the past.

The use of an administrative allocation method (as opposed to a point-in-time auction) suggests that interested parties may not all seek spectrum at the same time, and that demand may manifest over a period of time. In such a case, interested parties that seek spectrum early would have an advantage since they have the ability to acquire more than they need in order to prevent their competitors from acquiring sufficient spectrum, or indeed any spectrum. In doing so, they could constrain the ability of their rivals to compete with them in a downstream market. This is especially the case where the duration of the licence is long-lived. As noted in Chapter 4, the ACMA can issue apparatus licences with licence terms of up to 20 years,¹² although the ACMA has indicated that a licence term of up to 10 years may be suitable where there are a high number of users and mix use cases.¹³

For these reasons, allocation limits may be appropriate if there is a risk that, in the absence of limits, one single party could acquire the entirety, or the majority, of the spectrum in a given area in order to prevent its competitors from accessing the spectrum. However, to consider whether allocation limits are required, we need to have sufficient information about

¹² Subsection 103(3) of the *Radiocommunications Act 1992*.

¹³ ACMA, *Our approach to radiocommunications licensing and allocation – Implementing the Radiocommunications Legislation Amendment (Reform and Modernisation) Act 2020*, March 2021, p. 15.

the likely demand for the spectrum across the remote area, regardless of whether the demand is current or likely to arise sometime in the future.

On previous occasions, the ACCC has provided advice on allocation limits that would apply to the allocation of spectrum licences. In those cases, the allocation limits imposed would operate to restrict the amount of spectrum that a single party could acquire in a specific allocation (usually an auction), but would not have any effect after the allocation.

For the administrative issue of apparatus licences, the ACCC understand that it is possible for the ACMA to specify the timeframe for applying any allocation limits. The ACCC would be interested in stakeholders' views on the timeframe for applying any allocation limits that may be considered to be appropriate.

Should allocation limits not apply to the allocation, it remains open to the ACCC to consider the application of section 50 of the *Competition and Consumer Act 2010*, which prohibits acquisitions that may have the effect of substantially lessening competition in a market.

Issues for comment:

- 16. Do you consider that there is a risk that a single party may seek to acquire the entire, or majority, of spectrum available in any given areas? Please provide reasons and evidence for your views.**
- 17. Do you think that allocation limits are necessary for the 3.4–4.0 GHz band allocation in remote areas? Relevantly, would allocation limits promote competition and encourage investment in the relevant markets?**
- 18. If so, what do you think the appropriate allocation limits should be? Do you think different allocation limits should apply to different geographic areas within the remote area?**
- 19. How long do you think any allocation limits should apply for?**
- 20. Are there other factors that the ACCC should consider in assessing the possible allocation limits to apply?**

Appendix A

Consolidated list of issues for comment

1. What are the likely intended uses of 3.4–4.0 GHz band spectrum in remote Australia?
2. If you intend to acquire the spectrum to deploy wireless services:
 - (a) In what geographic areas do you intend to use the spectrum?
 - (b) Do you expect your intended use is likely to change in the future? If so, please provide examples of how that might change.
 - (c) What do you consider is the optimal allocation of 3.4–4.0 GHz spectrum to support your likely intended uses? What is the minimum allocation necessary?
 - (d) Is your demand for the spectrum for current use, or more likely to arise in the future?
3. Is there likely to be demand for the spectrum from entities that do not propose to use the spectrum but rather, intend to provide access to the spectrum to other users? If so, what is the extent of demand from these entities and in what geographic areas?
4. How is demand likely to be impacted by the:
 - (a) apparatus licence arrangements;
 - (b) likely format of the administrative assignment process; and
 - (c) licence duration?
5. What are the relevant downstream markets that are likely to be impacted by the 3.4–4.0 GHz band allocation in remote areas? Please clearly define the geographic dimensions of these markets, the providers of services and the end-users in these markets.
6. Are there any relevant markets in which the services could be provided by different types of network deployment?
7. Are there any relevant markets which consist of a single, or very small numbers of, end-user(s)?
8. Are there likely to be future relevant markets that have not been identified?
9. Do you have any views on the state of competition in the relevant downstream markets discussed by the ACCC?
10. Are there any other markets that you consider relevant? How would the allocation of spectrum in the 3.4–4.0 GHz band in remote areas impact competition and investment in these markets?
11. To what extent, if any, would licence duration impact competition and investment in these markets?
12. For an industrial end-user in a remote area, are the deployment models substitutable? That is, would wide area wireless broadband be substitutable for local area wireless broadband? Would these services be substitutable for private LTE, or 5G networks?
13. Do you consider that substitutable spectrum exists for the 3.4–4.0 GHz band in remote areas to enable the provision of services in the relevant downstream markets? If so, what spectrum do you consider to be a substitute?
14. Does the availability of substitutable spectrum differ within the remote area? Are there areas within the remote area, where no substitutable spectrum exists?

15. Should the ACCC take into account the availability of spectrum in the 1800 MHz band in remote areas when assessing the need for allocation limits? If so, how?
16. Do you consider that there is a risk that a single party may seek to acquire the entire, or majority, of spectrum available in any given areas? Please provide reasons and evidence for your views.
17. Do you think that allocation limits are necessary for the 3.4–4.0 GHz band allocation in remote areas? Relevantly, would allocation limits promote competition and encourage investment in the relevant markets?
18. If so, what do you think the appropriate allocation limits should be? Do you think different allocation limits should apply to different geographic areas within the remote area?
19. How long do you think any allocation limits should apply for?
20. Are there other factors that the ACCC should consider in assessing the possible allocation limits to apply?