

Monday 11th February 2013

Review of communication towers on Crown land

Independent Pricing & Regulatory Tribunal of New South Wales
PO Box Q290,
QVB Post Office NSW 1230

Dear Sir

Re- Review of rental arrangements for communications towers on Crown land

Master Communications and Electronics is a Sydney based company that has been in the Two Way Radio business since 1968. We are a key local supplier for NSW State Government entities and commercial business across NSW.

The IPART review of rental rates for communications towers is welcomed by our company.

Mastercom builds and also uses radio sites as part of our day to day business and the current arrangements are having a major impact on us and our customers. In some cases a reason for them to cancel services.

It is difficult to image a system that could be worse than the current regime

- The cost of Crown Land site cost is often higher than the site rental itself.
- The implementation process and costs are out of control and a barrier to being able to implement radio infrastructure.
- Many users are simply cancelling their services.

Using Spectrum Licence Holders as a guide to site usage is a failed process

- Spectrum licence holders on affected sites are sent contract documents whether they have any equipment on site or not.
- Owners of spectrum licences are not necessarily equipment owners.
- Class licence users are not captured by the land management agencies.
- Spectrum licences are not a true reflection of site usage.

Radio Site Economics

The current regime ignores the high cost for industry to establish radio site infrastructure and the market in which we operate. We truly hope that IPART is able bring some reality back to the table.

The industry is currently undergoing a major transformation as digital takes over from analogue services and we are acutely aware of the need for quality infrastructure. This is an opportunity for IPART to encourage growth in the sector, something the NSW economy sorely needs.

Mastercom has invested very heavily in new digital radio technology in Sydney and the ACT for commercial clients.

Under the current system Mastercom could not afford to invest in key regional markets were sites are affected by these costs.

Yours faithfully



Hamish Duff
Managing Director