



PUBLIC CONSULTATION REPORT

Response to Comments **on** **Proposed 2027 UAS Projects**

September 07, 2026

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1. Executive Summary

As part of the planning process for the 2027 Universal Access and Service (UAS) Programme, the National Information and Communications Technology Authority (NICTA) undertook a public consultation on the proposed programme set out in Consultation Paper No. UAS CP No.01/2027. The consultation was intended to validate the identified ICT access gaps, obtain views on proposed project priorities and locations, test the technical and procurement approach, consider funding and levy implications, and identify measures that would improve the sustainability and meaningful use of UAS investments.

The Consultation Paper proposed mobile broadband infrastructure as the principal investment priority for 2027, using 322 indicative sites identified through the 2025 ICT access gap assessment. The consultation envelope was approximately PGK 344 million, with indicative population coverage of 866,827 people. The paper expressly stated that the consultation list was a planning basis and did not constitute a procurement commitment to implement every site in the form presented.

NICTA received seven written submissions and held two face-to-face meetings with mobile network operators (MNOs). The consultation generated broad support for the objective of closing persistent rural and remote connectivity gaps. However, stakeholders consistently emphasised that the success of the programme should not be measured by infrastructure deployment alone. Sustainability, affordability, adoption, service quality, operational expenditure, technology choice, procurement efficiency, infrastructure sharing and coordination with existing or planned private investment were identified as critical considerations.

A significant area of convergence was the need for a genuinely technology-neutral and site-specific approach. Stakeholders generally accepted mobile broadband as a major 2027 priority, while recommending that NICTA should not prescribe a single architecture for all sites. Depending on population density, geography, logistics and existing infrastructure, appropriate solutions may include conventional macro sites, Rural Star/small-cell solutions, FWA, community Wi-Fi, satellite/LEO backhaul or hybrid configurations.

Stakeholders also recommended stronger site profiling and prioritisation, including consideration of population served, schools, health facilities, government institutions, economic activity, accessibility, infrastructure availability and cost per beneficiary. NICTA considers these recommendations useful and proposes to strengthen the final planning process through site validation and a weighted prioritisation framework.

The consultation also highlighted the importance of moving from a capital-deployment model towards a meaningful-connectivity model. Recommendations included measurable outcomes for service quality, uptime, institutional connectivity, affordability, active use and sustainability. NICTA will incorporate appropriate monitoring and evaluation indicators into project design and post-implementation assessment.

On funding, several stakeholders proposed alternatives or complements to the UAS Levy, including Government funding, operator co-investment, provincial/DDA support, development-partner financing, voluntary investment and other approved mechanisms. NICTA will continue to assess these options while maintaining the statutory requirements governing the UAS Fund and levy determination. Stakeholder proposals relating to spectrum facilitation, including 900 MHz access, will be referred to the relevant regulatory processes and will not be treated as an automatic entitlement.

Based on the consultation, NICTA proposes to retain the strategic objective of expanding broadband access in 2027, while refining the programme before final approval. The 322-site portfolio will therefore be treated as a planning baseline rather than a final procurement list. The final programme will be subject to site validation, legal and regulatory assessment,

technical feasibility, existing/planned operator investment checks, cost validation, prioritisation and available funding.

2. Background and Purpose

2.1. Background

The UAS Programme is a principal mechanism through which NICTA supports the extension of ICT services to underserved and unserved communities where commercial investment alone is insufficient. The 2027 Consultation Paper identified persistent mobile broadband gaps and proposed mobile broadband infrastructure as the principal investment priority.

The Consultation Paper reported approximately 89% population coverage for 2G, 77% for 3G and 70% for 4G/LTE, while mobile penetration remained approximately 28%. The consultation therefore recognised a distinction between network availability and actual meaningful use.

2.2. Purpose of the Consultation

- Validate the identified ICT access gaps and proposed priority locations.
- Obtain stakeholder views on project prioritization and selection criteria.
- Assess the proposed technology, infrastructure sharing and resilience framework.
- Test the indicative programme costs and funding assumptions.
- Obtain views on the 2027 UAS Levy and alternative/complementary funding mechanisms
- Improve the procurement and implementation approach.
- Identify risks and measures required to achieve sustainable and meaningful connectivity.

2.3. Consultation Basis

The consultation was issued on 6 August 2026 under Consultation Paper No. UAS CP No.01/2027. The paper identified 322 indicative mobile broadband sites, with an indicative programme value of approximately PGK 344 million and an estimated population benefit of 866,827 people. The paper also stated that the consultation was not a procurement process and did not constitute a commitment by NICTA to implement projects exactly as presented.

3. Consultation Process and Participation

The consultation period concluded on 31 August 2026. NICTA received seven written submissions and undertook two face-to-face meetings with MNOs. The submissions and meetings were reviewed to identify both stakeholder-specific issues and common themes that should inform the final 2027 project report.

Stakeholder/ Engagement	Principle areas of feedback NICTA Response
Welchman Keen	Meaningful/productive connectivity; site profiling; weighted prioritisation; community anchor and productive sites; Economic Micro Hub (EMH) model; differentiated procurement; sustainability and OPEX.
Emstret Holdings	Outcome-based procurement; technology neutrality; regional/provincial clustering; open access; co-investment; meaningful-connectivity KPIs; spectrum facilitation; 5–10 site pilot.
Lightspeed Limited	LEO/solar alternatives for low-density and difficult sites; Konektim Community Connectivity model; digital financial inclusion; open access to satellite/community Wi-Fi; rapid supplier panel/framework.

Telikom Limited	Support for mobile broadband priority; open-access commercial terms; avoidance of duplication; mixed procurement; Government funding in place of levy; cybersecurity; vulnerable-user access; Wi-Fi offload; population-density technology selection.
Vodafone PNG	Support for coverage expansion; 900 MHz access; technology neutrality; OPEX sustainability; Rural Star/alternative solutions; geographic and technology lotting; co-location framework; continuity of service.
Digicel PNG	Support for access-gap objectives but concern over scale, implementation timeframe, funding basis and site prioritisation; technology-neutral/outcome-based approach; mandatory licence areas; voluntary investment and alternative delivery mechanisms.
Other written submissions	Additional stakeholder comments received during the consultation were reviewed and incorporated into the consolidated thematic findings and action plan.
Two MNO face-to-face meetings	Clarification of site rollout, procurement, spectrum, co-investment/voluntary deployment and alternative approaches to levy funding.

4. Overview of Stakeholder Feedback

Overall, stakeholder feedback did not reject the objective of expanding connectivity. Rather, stakeholders challenged the assumptions around how the proposed portfolio should be delivered, financed and sustained. The principal feedback can be grouped into eight themes.

Theme	Consolidated Finding
Main Focus on persistent access gaps	Maintain focus on persistent access gaps Stakeholders generally agreed that unserved and underserved communities require continued public intervention, particularly where commercial deployment is unlikely.
Refine the 322-site portfolio	The list should be treated as a planning baseline and validated against current coverage, operator plans, infrastructure, population, logistics, land access and cost.
Use Site-Specific and technology-neutral solutions	Macro, Rural Star, FWA, small cell, Wi-Fi, satellite/LEO and hybrid options should be considered where they meet defined service outcomes.
Prioritise meaningful connectivity	Coverage should be supplemented by service quality, uptime, affordability, institutional connectivity, adoption and sustainability indicators.
Strengthen sustainability and OPEX planning	Remote sites require realistic operations and maintenance arrangements, including power, fuel, security, access, spares and local technical support.
Improve Procurement	Stakeholders proposed geographic clustering, outcome-based specifications, prequalification/frameworks, differentiated procurement models and performance-linked payments.

Improve Infrastructure sharing and coordination	UAS assets should support fair and transparent access, while existing and planned operator infrastructure should be checked to avoid duplication.
Diversify funding and partnerships	Government, operators, provincial/DDA, development partners and voluntary/co-investment arrangements should be considered alongside the UAS Levy where legally and financially appropriate.

5. Key Issues Raised and NICTA Responses

Overall, stakeholder feedback did not reject the objective of connectivity, the issues raised are provided with addressed in the table below.

Theme	Stakeholder feedback	NICTA response
Scale and affordability of the 322-site proposal	Several stakeholders questioned whether the entire indicative portfolio could realistically be procured, funded and deployed within one implementation cycle.	NICTA Response: The 322 sites will be treated as a planning baseline. Final site selection will be subject to validation, prioritisation, technical feasibility, funding availability, procurement sequencing and existing/planned commercial investment. The indicative PGK 344 million is a consultation envelope, not a final funding commitment.
Technology neutrality	Stakeholders supported technology neutrality but asked that it be made operational by allowing FWA, small cells, satellite/LEO, Wi-Fi, microwave and hybrid solutions.	NICTA Response: NICTA will retain technology neutrality and define minimum service outcomes. The final procurement documentation will avoid unnecessarily prescribing a single architecture, subject to technical, licensing, safety and regulatory requirements.
Site prioritisation and profiling	Stakeholders recommended ranking sites using population, institutions, economic activity, accessibility, infrastructure, cost and sustainability factors.	NICTA Response: NICTA will strengthen the site profiling process and apply a weighted assessment. Population benefit will remain important but will not be the sole criterion.
Access gap versus service quality gap	Emstret distinguished no coverage, poor quality/capacity, affordability barriers and unconnected institutions. Digicel requested clearer evidence of priority gaps.	NICTA Response: The immediate 2027 supply-side focus remains on connecting communities without adequate mobile broadband access. Service-quality gaps are also relevant to regulatory enforcement and future programme planning. The final portfolio will be checked against current network information and operator plans.

Mandatory licence obligations	Digicel stated that some locations may fall within mandatory coverage obligations and should not receive UAS subsidy.	NICTA Response: NICTA will undertake a legal and regulatory eligibility review of proposed sites against applicable licence conditions. Where a site is within an operator's mandatory obligation, the basis for UAS intervention will be reviewed before inclusion.
Open access and co-location	Stakeholders broadly supported open access but requested clear commercial terms, fair cost recovery, power/backhaul sharing and non-discriminatory access.	NICTA Response: NICTA will strengthen the open-access framework and develop clearer principles for co-location, access, power, backhaul, O&M and service arrangements, consistent with the regulatory framework.
OPEX and long-term sustainability	Stakeholders highlighted high recurring costs for fuel, transport, security, maintenance and remote access and warned against infrastructure becoming inactive after initial deployment.	NICTA Response: Whole-of-life cost will be considered during evaluation. NICTA will assess appropriate OPEX support or sustainability mechanisms for difficult sites, subject to the UAS Fund framework and affordability of the programme.
Procurement structure	Stakeholders proposed geographic clusters, outcome-based procurement, prequalification/frameworks and differentiated procurement for macro, rural and satellite solutions.	NICTA Response: NICTA will refine the procurement strategy to improve competition, implementation speed and fit-for-purpose delivery. Any alternative procurement mechanism will remain subject to applicable procurement and financial management requirements.
LEO/satellite and community connectivity	Lightspeed and other stakeholders proposed LEO/solar solutions for very low-density, island, maritime and difficult sites.	NICTA Response: These options will be assessed through site-specific technical and cost comparison. Where a non-terrestrial solution provides the required service more efficiently, it may be considered within the technology-neutral framework.
Economic Micro Hub / productive connectivity	Welchman Keen recommended using the Vanuatu EMH model to connect institutions and stimulate recurring demand and economic activity.	NICTA Response: NICTA recognises the value of demand stimulation and productive use. The EMH concept will be considered as a potential pilot or complementary model rather than assumed as the delivery model for all sites.
Meaningful connectivity	Stakeholders recommended KPIs covering coverage, service quality, institutions, affordability, adoption and sustainability.	NICTA Response: NICTA will strengthen the monitoring framework to measure outcomes

		beyond physical deployment and population coverage.
Spectrum facilitation	Vodafone, Emstret and other stakeholders highlighted spectrum availability, including 900 MHz, as an enabler for rural deployment.	NICTA Response: Spectrum matters will be addressed through the applicable spectrum management and licensing processes. Facilitation may be considered where legally available and technically justified, but will not constitute an automatic entitlement.
Alternative funding	Stakeholders proposed Government funding, voluntary operator deployment, co-investment, provincial/DDA support and development-partner financing.	NICTA Response: NICTA will continue to explore blended and complementary funding while applying the statutory framework governing the UAS Fund and levy.
Cybersecurity and user protection	Telikom recommended baseline cyber-hygiene, user awareness and protection measures as new communities are connected.	NICTA Response: Cybersecurity and responsible-use considerations will be incorporated into relevant project and partnership planning, including awareness and minimum technical requirements where appropriate.
Digital financial inclusion and demand stimulation	Lightspeed proposed integrated payments/agent banking; other stakeholders emphasised devices, digital skills, local content and institutional use.	NICTA Response: These proposals support the broader meaningful-connectivity objective and will be considered as complementary measures, subject to programme scope, funding and partnership opportunities.

6. Detailed Responses to Stakeholder Submissions

6.1. Welchman Keen

Welchman Keen broadly supports mobile broadband as the foundation for addressing access gaps, but emphasises that success should be measured by meaningful, productive and sustainable use rather than infrastructure deployment alone.

NICTA notes the recommendation to distinguish coverage expansion sites, community anchor sites and productive connectivity sites. This distinction is useful for project profiling and will be considered in the final site assessment.

Welchman Keen proposed applying an Economic Micro Hub (EMH) model, drawing on experience in Vanuatu. NICTA recognises the potential of a hub model to create recurring demand through institutions, services, local enterprise and community activity. NICTA will consider a limited pilot rather than applying the model universally.

Welchman Keen recommended profiling the 322 sites using population coverage, schools, health facilities, government institutions and other relevant indicators, followed by weighted

ranking. NICTA agrees that a structured weighted approach will strengthen prioritisation and improve transparency.

Welchman Keen also recommended differentiated procurement for macro mobile broadband, rural broadband and fixed/LEO/Wi-Fi solutions. NICTA agrees in principle that procurement packaging should reflect materially different technical and operational characteristics while retaining competitive and technology-neutral outcomes.

NICTA also recognises the risks identified by Welchman Keen, including adoption, OPEX sustainability and long-term operational viability. These will be incorporated into the final risk and implementation framework.

6.2. Emstret Holdings

Emstret supports the 2027 objective, technology neutrality, open access and blended funding. Its principal recommendation is that NICTA procure measurable connectivity outcomes rather than a fixed network architecture.

NICTA agrees that final specifications should focus on service outcomes. The final approach may permit macro, FWA, small-cell, satellite/microwave, community Wi-Fi and hybrid solutions where they meet defined requirements.

Emstret recommended regional/provincial clustering, prequalification and framework arrangements. NICTA will assess appropriate lotting and procurement structures against the applicable procurement and financial management framework.

Emstret recommended meaningful-connectivity KPIs including service quality, institutional connectivity, affordability, adoption and sustainability. NICTA will strengthen the monitoring framework accordingly.

Emstret proposed a 5–10 site technology-neutral pilot. NICTA considers this a useful mechanism to compare alternative delivery models and will assess the feasibility of a pilot within the final programme and procurement strategy.

Emstret also proposed clearer spectrum facilitation, open-access rules, whole-of-life cost evaluation and performance-linked disbursement. These recommendations will be considered in the relevant technical, procurement and regulatory workstreams.

6.3. Lightspeed Limited

Lightspeed supports mobile broadband as the core 2027 priority but recommends technology-neutral screening of the lowest-population/highest-cost sites against LEO satellite and solar alternatives.

NICTA notes that some difficult island, maritime and mountainous sites may have materially different economics from conventional macro deployment. Site-level comparison will therefore be undertaken where alternative technologies may provide a more cost-effective outcome.

Lightspeed proposed the Konektim Community Connectivity model, combining LEO satellite, solar power, managed Wi-Fi and potential digital payment capability. NICTA considers this relevant as a complementary solution for institutions and communities where terrestrial deployment is not viable within the implementation period.

Lightspeed recommended a parallel supplier panel/framework for rapid satellite/solar solutions. NICTA will assess this option within the applicable procurement framework.

Lightspeed also proposed integrated digital financial inclusion and a defined meaningful-connectivity funding component. NICTA recognises the value of these measures but will determine the final scope and funding allocation through the broader programme planning process.

6.4. NEUROFIG

NeuroFig recommended a standard Site Acceptance Evidence Record for each UAS-funded site to support consistent documentation of site readiness, installation, acceptance testing, commissioning and ongoing operational performance. The submission also proposed defined evidence gates throughout the project lifecycle.

NICTA notes the recommendations and will consider their relevance and applicability in the further development of the 2027 UAS project procurement, acceptance and monitoring arrangements.

6.5. Telikom Limited

Telikom supports continued prioritisation of mobile broadband and the evidence-based site selection approach. It also supports infrastructure sharing in principle.

Telikom requested cost-reflective commercial access terms and Government support where sharing obligations could otherwise become commercially unsustainable. NICTA will consider these matters when developing the open-access and sharing framework.

Telikom requested reconciliation of the 322 sites with its existing and planned network investment. NICTA agrees that duplication should be avoided and will seek updated operator information before finalising the portfolio.

Telikom proposed mixed procurement, including competitive tendering for greenfield clusters and alternative arrangements for sites adjacent to existing infrastructure, subject to procurement rules. NICTA will assess this approach for legal and procurement compliance.

Telikom proposed Government funding rather than the UAS Levy. NICTA notes the recommendation and will consider all available funding options while applying the statutory framework for UAS financing.

Telikom recommended cybersecurity and user protection measures. NICTA will consider baseline requirements and awareness measures as part of project and service planning.

Telikom also proposed Wi-Fi offload and population-density-based technology selection. NICTA considers these consistent with the technology-neutral approach and will assess such solutions where they meet the required outcomes.

6.6. Vodafone PNG

Vodafone supports the objective of accelerating national coverage but emphasises technology design, OPEX, sustainability and equitable spectrum access.

Vodafone's request for access to 900 MHz is noted. Spectrum allocation and facilitation will be handled through the applicable regulatory process. NICTA recognises that spectrum availability can materially affect the economics of rural deployment.

Vodafone recommended that the programme consider 3–5 year OPEX support for difficult sites. NICTA recognises the sustainability concern and will assess appropriate OPEX mechanisms based on site conditions, service obligations and UAS funding constraints.

Vodafone proposed technology-neutral procurement, geographic and technology lotting, and stronger co-location arrangements. These recommendations align with the broader consultation findings and will inform the final procurement strategy.

Vodafone's recommendation to use Rural Star solutions for particularly difficult sites will be considered alongside other alternatives, including LEO/satellite, FWA and Wi-Fi solutions, using site-specific cost and service comparisons.

NICTA will also review Vodafone's information on access logistics and recurring costs when validating the site portfolio and implementation schedule.

6.7. Digicel PNG

Digicel broadly supports the objective of extending connectivity but raises significant concerns regarding the scale of the indicative programme, deployment timeframe, funding implications and the basis for determining site priorities.

NICTA clarifies that the 322 sites were presented as an indicative planning list and not as a commitment to procure all 322 sites in the form presented. The final programme will be determined after validation, prioritisation and funding assessment.

Digicel considers that locations falling within mandatory coverage obligations should generally not receive UAS subsidy. NICTA will conduct a legal and regulatory review of relevant sites before final inclusion.

Digicel supports technology neutrality but cautions against limiting the programme to conventional mobile macro architecture. NICTA agrees that the programme should define outcomes and permit appropriate site-specific technologies.

Digicel also raised concerns regarding the ability of the current UAS process to deliver within the implementation window. NICTA will seek to improve procurement readiness, early site validation, lotting and implementation sequencing to reduce avoidable delays.

Digicel's position on voluntary investment and alternatives to levy funding will be considered as part of the broader funding and operator engagement strategy. Verified private investment may also inform final project prioritisation and avoid duplication.

6.8. Face-to-Face MNO engagements

The two face-to-face meetings with MNOs provided an opportunity to clarify written submissions and discuss practical options for improving the 2027 programme.

Key matters discussed included site validation, operator rollout plans, procurement structure, spectrum availability, voluntary deployment/co-investment, alternative funding mechanisms and the relationship between UAS subsidy and private network investment.

NICTA will use the information provided during these engagements, together with written submissions and technical assessments, to refine the final project list and implementation approach. Any proposed operator commitments will require appropriate confirmation and, where applicable, formalisation before being treated as programme funding or delivery commitments.

7. Consolidated Common Themes and Proposed Actions

The consultation demonstrates a high degree of convergence around the need to improve the effectiveness and sustainability of UAS investment. The following action plan consolidates the principal issues raised and the proposed NICTA response.

Theme	Proposed action	Timing
Site validation and prioritisation	Validate coverage, population, institutions, infrastructure, land/access, backhaul, power and operator plans; apply weighted scoring.	Before final project recommendation
Technology-neutral delivery	Define service outcomes and permit appropriate macro, Rural Star, FWA, small-cell, Wi-Fi, satellite/LEO or hybrid solutions.	Final project design and RFP
Meaningful-connectivity measurement	Add indicators for uptime, service quality, institutional connectivity, affordability, adoption and sustainability.	Project design and post-implementation

Whole-of-life costing	Evaluate CAPEX and recurring OPEX, including power, fuel, access, security, maintenance and backhaul.	Cost register and tender evaluation
Infrastructure sharing	Strengthen co-location, power, backhaul and access principles and ensure non-discriminatory treatment.	Before procurement
Operator investment reconciliation	Cross-check proposed sites against current and planned commercial rollouts and verified voluntary commitments.	Before final site list
Procurement reform	Assess geographic lotting, technology-specific procurement where justified, prequalification/frameworks and performance-linked payments.	Procurement strategy
Alternative connectivity pilot	Assess a 5–10 site technology-neutral pilot covering difficult terrain, islands and low-density communities.	2027 programme
EMH/productive connectivity pilot	Assess community anchor/productive connectivity models that link infrastructure to recurring institutional and economic activity.	Pilot design
Spectrum facilitation	Coordinate required spectrum matters through the applicable licensing and spectrum management process.	Pre-deployment
Blended funding	Assess Government, provincial/DDA, development-partner, operator and other approved co-funding opportunities.	Programme financing
OPEX sustainability	Develop practical mechanisms for difficult sites, including defined O&M responsibilities and possible initial support where justified.	Project agreements
Cybersecurity and user protection	Include baseline security and awareness measures appropriate to newly connected users and infrastructure.	Project specifications
Demand-side enablement	Consider digital skills, devices, local content, public-institution connectivity and digital financial inclusion as complementary measures.	Meaningful connectivity programme

8. Implications for the Final 2027 UAS Programme

8.1. Proposed Programme Direction

Following consultation, NICTA should retain the strategic direction of prioritising broadband connectivity to persistent unserved and underserved communities. However, the final

programme should move from a fixed list-and-technology approach towards a validated, prioritised and outcome-based portfolio.

- The 322 sites remain the initial planning baseline and are not to be interpreted as an automatic final project list.
- Each site should be profiled and ranked using a transparent weighted framework.
- Current coverage and planned operator investment should be verified before procurement.
- Technology should be selected on a site-specific basis against defined service outcomes and whole-of-life cost.
- High-cost/low-density sites should be screened for alternative solutions such as satellite/LEO, Wi-Fi, FWA or hybrid approaches.
- Priority institutions and productive community activity should be considered in addition to population coverage.
- Projects should include appropriate sustainability, O&M and performance requirements.
- Procurement lots should be designed to balance scale, competition, delivery capacity and geographic/logistical realities.

8.2. Funding and Levy Implications

The consultation produced differing views on the appropriate funding source. Some stakeholders recommended Government funding in place of the UAS Levy, while others proposed voluntary operator investment, co-investment and development-partner funding. NICTA therefore should not base the final programme solely on the indicative PGK 344 million envelope. The final project portfolio and funding requirement should be established following validation and prioritisation, after which the statutory levy determination process can be undertaken.

Where alternative funding or verified operator investment can reduce the required UAS subsidy without compromising the programme's objectives, NICTA should consider such arrangements subject to applicable legal, financial and procurement requirements.

8.3. Procurement and Implementation

The consultation indicates that a single procurement structure may not be optimal for all site types. NICTA should therefore assess differentiated procurement packaging while retaining open and competitive processes. The final approach should provide for clear service outcomes, site-specific technical requirements, transparent evaluation criteria, realistic implementation timelines and performance-linked payment arrangements.

8.4. Monitoring and Evaluation

Monitoring should extend beyond the number of sites constructed. The final programme should establish a meaningful-connectivity scorecard covering, as appropriate, population/community coverage, service quality, uptime, institutions connected, affordability, active users/adoption, fault restoration and O&M compliance.

9. Conclusion and Recommendations

The 2027 public consultation confirms broad stakeholder support for NICTA's objective of addressing persistent ICT access gaps. The principal issue emerging from the consultation is not whether public intervention remains necessary, but how NICTA can ensure that UAS investment produces sustainable and meaningful connectivity while maximising value for money.

Stakeholders have provided practical recommendations on site prioritisation, technology choice, procurement, infrastructure sharing, OPEX sustainability, spectrum, alternative connectivity, funding and demand stimulation. While not all recommendations can be adopted in full, the consultation provides a strong basis for refining the proposed programme.