

5 February 2014



Ms Catherine Gladman
Radiocommunications Licencing Policy and Allocations Capability Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616
Email: Radiocommunications.Policy@acma.gov.au

Dear Catherine,

RE: Proposal to remake instruments: Radiocommunications (Cellular Mobile Telecommunications Devices) Class Licence 2002 and Radiocommunications (Cordless Communications Devices) Class Licence 2001

Communications Alliance welcomes the opportunity to make a submission on the ACMA Consultation Paper on remaking the *Radiocommunications (Cellular Mobile Telecommunications Devices) Class Licence 2002* and *Radiocommunications (Cordless Communications Devices) Class Licence 2001*.

The membership of Communications Alliance covers both terrestrial mobile and fixed service operators and is thus well representative of industry covering mobile cellular technologies. We note that with the exception of the vendors that are represented through our Carrier/CSP members, the ACMA may benefit by drawing upon the knowledge of specific vendors of cordless equipment who are not represented by Communications Alliance.

In summary Communications Alliance supports the approach being proposed by the ACMA in this paper and would like to make the following specific comments:

1. The Cellular Devices Class Licence covers ordinary user terminals that are used in relation to Apparatus (PTS) licensed cellular networks (see clause 5(1)) as well as the special case of user terminals on board an aircraft (see clause 5(3)) communicating with a licensed on-board pico-cell (PTS Class C).

Communications Alliance is uncertain why there is a need to separately distinguish/highlight the airborne user terminals – since the on-board host pico-cell is itself authorised under a PTS (Class C) licence. These terminals should be sufficiently covered by clause 5(1). It would be helpful if the ACMA could clarify why the airborne user terminals need to be treated separately.

2. The ACMA is considering a possible restructure of the 900 MHz band (806-960 MHz) to enable future mobile services to operate in the 852-869 MHz frequency range. If such a restructure is likely then it would be helpful if the operation of legacy cordless devices in the 857-861 MHz and 861-865 MHz frequency ranges

could be phased out over time. The first step might be to downgrade the status of these systems in the *Cordless Devices Class Licence*, by allowing for the ongoing use of existing devices but prohibiting the future importing, manufacture or sales of such devices in Australia.

If you have any further questions with regards to the points raised in this submission please contact Mike Johns on (02) 9959 9125.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton', written in a cursive style.

John Stanton
Chief Executive Officer