

31 May 2018



Eleanor Kay

Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 78, Belconnen ACT 2616

Dear Eleanor,

RE: Proposed amendments to licensing arrangements for body scanners at Australian airports

The Communications Alliance Satellite Services Working Group (SSWG) commends the ACMA for its proposal to simplify the licensing of airport body scanners. The SSWG agrees that the potential interference distances of airport body scanners from ubiquitous devices, such as 5G, in the 26 GHz bands is very low, being in the order of tens of meters.

The SSWG also contends that Earth Stations in the Fixed Satellite Services around airports, be they fixed or Earth Stations In Motion (ESIM), with their highly directional antennas will not present any interference risk. Likewise, the directivity and elevation angle of ESIM antennas operating on aircraft within an airport environment, combined with building penetration losses, provide the desirable protection. Similarly in the 28 GHz bands, Broadband Wireless Access systems (BWA) installed outside the airport do not pose any interference risk. While it is plausible that a BWA system could operate inside an airport terminal, as the ACMA suggests, coordination and authorisation of all services is a site management issue.

Therefore, the SSWG supports and applauds the removal of unnecessary restrictions and in particular:

'As part of a transition to class licensing, these RALIs would be amended to make clear that there would be no coordination requirements for class-licensed body scanners at airports, and that body scanners operate on a 'no-interference, no-protection' basis with respect to apparatus-licensed services'

ACMA consultation paper IFC: 10/2018 Proposed amendments to
licensing arrangements for body scanners at Australian airports

In general, Communications Alliance supports any advances in spectrum management that facilitate multiple users in any particular band and believes this paradigm should be used when designing future licensing arrangements for 5G services where sharing has been found to be possible.

The SSWG also strongly supports the ACMA's intention to bring regulation into line with contemporary international frameworks. This has the dual benefits of flexibility and economic advantages for the scanner community, whilst taking into account modern needs and developments in aviation communications.

Thank you for your consideration of this submission. If you have any questions with regards to this response, please contact Mike Johns on (02) 9959 9125.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Stanton". The signature is written in a cursive style with a large, stylized initial "J".

John Stanton
Chief Executive Officer