

8 February 2019



Mark Arkell

Manager
Spectrum Engineering & Space
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Communications Infrastructure Division
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Email: mark.arkell@acma.gov.au

Dear Mark,

RE: MS 38 Coordination between earth station transmitters in the fixed-satellite service and other services in the 25.5-30 GHz band

The Communications Alliance Satellite Services Working Group (SSWG) would like to thank the ACMA for the opportunity to comment on the proposed updates to RALI MS 38 *Coordination between earth station transmitters in the fixed-satellite service and other services in the 25.5-30 GHz band*.

The SSWG reaffirms its support for the proposed changes to the Radiocommunications Assignment and Licensing Instructions RALI MS 38, to remove the coordination requirements for body scanners which are now authorised via class licences.

As in our earlier submission on the *ACMA Proposed amendments to licensing arrangements for body scanners at Australian airports*, dated 31 May 2018, the SSWG supports 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.

On a minor editorial issue, the SSWG would like to draw your attention to the first bullet point under Section 1.2 *Scope* referencing body scanners – this bullet point should be removed.

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'.

John Stanton
Chief Executive Officer