

11 August 2014

David Brumfield
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Dear David

Re: Transitioning the 3.5 GHz band for future opportunities Consultation paper

Communications Alliance welcomes the opportunity to provide our response to the ACMA *Transitioning the 3.5 GHz band for future opportunities* Consultation Paper.

The comments provided in this letter cover a number of points raised by the members of our Satellite Services Working Group (SSWG) who recently met and took the opportunity to provide their views on the Consultation Paper. This response does not represent an exhaustive review of the Paper and is being provided as some initial commentary to assist the ACMA with their considerations of this spectrum band.

The SSWG is a grouping of satellite-related companies active in the Australian market and includes satellite operators, satellite service providers, manufacturers and ground-segment installers. Some of our members, including Optus and Telstra, have indicated that they will be submitting their own responses and the comments provided here do not necessarily represent their views.

Communications Alliance commends the ACMA in the work in developing this Consultation Paper and wishes to provide the following observations:

- recognition that sharing studies are still being considered by the ITU-R in preparation for the forthcoming World Radiocommunication Conference (WRC-15) and agreeing with the Consultation Paper in saying that many countries are only at an initial stage of reviewing options for use of the this band with trending anticipated to become clearer over the next few years.
- the WRC-15 Meeting will be considering the potential for further IMT identification in the 3.4 to 3.6 GHz band. The outcome of the IMT review is by no means certain until the decisions of WRC-15 are known.
- the international Table of Frequency Allocations to services which for the three ITU-R Regions has Fixed Satellite Services (FSS) allocated as a Primary Allocation whereas the Australian Table of Frequency Allocations lists the FSS as Secondary. In addition, in the Australian Table, the allocation to mobile (which is Secondary worldwide) is Primary. This is an international aberration which may not be reflected in international manufacturing decisions.

The SSWG feels that with the considerable uncertainty over the future of the 3.5 GHz band, it may be premature for the ACMA to lock in longer term mechanisms within the band plans for this range of frequencies at this point in time.

If you have any further questions with regard 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". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John Stanton
Chief Executive Officer

CC: Eleanor Kay, Eleanor.Kay@acma.gov.au