

26 February 2019



**Mark Arkell**

Manager  
Spectrum Engineering & Space  
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Australian Communications and Media Authority  
Email: mark.arkell@acma.gov.au

Dear Mark,

**RE: Proposed updates to class licensing arrangements supporting 5G and other technology innovations**

The Communications Alliance Satellite Services Working Group (SSWG) would like to thank the ACMA for the opportunity to comment on the *Proposed updates to class licensing arrangements supporting 5G and other technology innovations* Consultation Paper.

The SSWG is highly supportive of arrangements to usher in 5G, and keen to see that satellite communications take up a relevant complementary role, as explained in the recent submissions to the 28 GHz ACMA consultation. At the same time, other ongoing initiatives and innovations in the satellite industry need to be taken into consideration by the ACMA, particularly where there are satellite frequency allocations.

The SSWG supports the timely initiative of updating the 60 GHz arrangements signalled in the latest FYSO, and an updating of the 66 to 71 GHz arrangements, in accord with other relevant regulatory jurisdictions. We would foreshadow further developing details and classes of equipment following the outcomes of the WRC-19 Conference.

With regard to WRC-19, the global satellite industry is generally supportive of a combination of outcomes for the 66 to 71 GHz, 71 to 76 GHz, and 81 to 86 GHz bands. Those combinations involve a mixture of IMT, regulatory measures to protect FSS and the ability to deploy FSS gateways.

In particular, the 66 to 71 GHz band looks to be supported within the European Conference of Postal and Telecommunications (CEPT), the African Telecommunications Union (ATU) and potentially other some of the other administrative regions. It appears that, at present, all the interest is positive. This aligns with the plans for WRC-19, which are developing within the industry and the ACMA and aligns with the Australian brief being developed.

It is noted that the 71 to 76 GHz and 81 to 86 GHz bands are not currently supported by the CEPT, the Regional Commonwealth in the Field of Communications (RCC) and potentially some of the other administrative regions. Therefore, the SSWG is pleased with the current support for the extension to the 66 to 71 GHz arrangements. Extensions by the Federal Communications Commission (FCC), Canada, UK and the European Commission (EC) are also noted.

The SSWG is aware that the ACMA anticipates an update after the WRC-19 meeting. In the meantime, the SSWG encourages the ACMA to continue its progress in parallel with international developments, in order to not to lose momentum while waiting for the outcomes of the WRC-19 conference. Our industry members will be in a position to provide further details of classes of equipment that could be included, once the outcomes of the WRC-19 conference are known.

The SSWG would also like to raise a minor point relating to the description of Class Licensing. Consideration could be given to providing guidance for the the situation where two LIPD devices interfere, to determine where responsibilities lie. This may have important practicalities for any resolution process.

Although not currently included within the 'Issues for Comment' of this consultation, the SSWG notes that WRC-19 Agenda Item 9.1.1 is considering the compatibility between terrestrial and satellite IMT in the S-band. Together with increasing interest in the use of this band in Australia for Mobile Satellite Service (MSS) and terrestrial IMT services, the ACMA should also consider reinstating this band for Class Licensing. Whilst the WRC will no doubt find a resolution of the competing demands from both satellite and terrestrial ubiquitous services, both sets of services might depend on Class Licensing of user terminals.

This submission does not necessarily represent the views of Telstra, which is lodging its own submission.

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', written in a cursive style.

John Stanton  
**Chief Executive Officer**