

16 December 2022



Christopher Hose

Executive Manager
Spectrum Planning and Engineering
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616
Email: freqplan@acma.gov.au

Dear Chris

RE: Review of the 2 GHz band spectrum licence technical framework consultaion

The Communications Alliance Satellite Services Working Group (SSWG) welcomes the opportunity to comment on the ACMA's *Review of the 2 GHz band spectrum licence technical framework* consultation.

The SSWG would like to thank the ACMA in its work in its review of the 2 GHz spectrum licence technical framework, being a part of the broader work program outlined in the FYSO 2022-27, that is reviewing existing spectrum licence technical frameworks to cater for new developments such as 5G and Advanced Antenna Systems. The following responses are to the issues for comment listed in the consultation paper.

1. The ACMA is seeking comment on the two options proposed for unwanted emissions in the frequency range 2100–2110 MHz.

The SSWG has no comment on these proposals as they do not lie within our remit.

2. Comment is sought on the effect the proposed changes to the 2 GHz technical framework may have on incumbent services in the 2 GHz band and adjacent bands.

The SSWG is pleased to support the proposed changes. These proposed unwanted emission limits in the 2170 – 2180 MHz band will in our view reduce the probability of interference into MSS systems.

3. Comment is sought on the changes proposed to the:

• 2 GHz band spectrum licences conditions.

The SSWG supports the use of the 3GPP standards as used to derive the out of band emission limits into the 2170 – 2180 MHz MSS band.

• Draft Radiocommunications (Unacceptable Levels of Interference – 2 GHz Band) Determination 2016 (s.145(4) determination 2023).

The SSWG believes the proposed changes to Schedule 2 and 3 maintain an acceptable level of protection against adjacent MSS operations.

4. **The Radio Advisory Guidelines for this band will sunset in 2026. We have formed the view that the instrument is operating efficiently and effectively, and we propose to remake the instrument. This will ensure the instruments remain valid for the remainder of the spectrum licence period. Comment is sought on remaking of the instruments:**

- **Draft Radiocommunications Advisory Guidelines (Managing Interference from Spectrum Licensed Transmitters – 2 GHz Band) 2023**

The proposed changes are acceptable. The SSWG is satisfied that a compliant transmitter operating under a 2 GHz spectrum license will not interfere with MSS receivers.

- **Draft Radiocommunications Advisory Guidelines (Managing Interference to Spectrum Licensed Receivers – 2 GHz Band) 2023.**

The proposed changes provide clarity for the operation of licensed receivers.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,



John Stanton
Chief Executive Officer

About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:

<http://www.commsalliance.com.au/>