

3 December 2018



Eleanor Kay

Manager
Spectrum Licensing Policy Section
Spectrum Management Policy Branch
Australian Communications and Media Authority
PO Box 78 Belconnen ACT 2616
Email: SpectrumLicensingPolicy@acma.gov.au

Dear Eleanor,

RE: CA SSWG comment on the ACMA Licence Tax determination Consultation

The Communications Alliance Satellite Services Working Group (SSWG) would like to thank the ACMA for the opportunity to comment on the proposed changes to annual apparatus licence taxes.

The SSWG notes that there will be a future review of all radio-communications licensing fees, charges and taxes under a future Spectrum Pricing Review.

Given the impending future review of Spectrum Pricing, it may be prudent to not proceed with the CPI increase at this stage, however this issue is not of great concern to SSWG members.

The SSWG also believes that licensing of Earth Stations and Space Stations does not take into account the very high level of intra-service spectrum utility, via the ability to share with multiple systems, particularly in bands authorised by way of the *Radiocommunications (Communication with Space Object) Class Licence 2015*. With this in mind, the SSWG members believe the review should also include a full review of Earth Station and Space Station licence fees and charges which considers these services' ability to share spectrum.

The SSWG membership comprises significant expertise in satellite licensing and indeed spectrum planning and the SSWG offers its expertise to the ACMA when the review is undertaken.

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