



Australian Government

Department of Defence

Chief Information Officer Group

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The Manager
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REPLANNING THE 2 GHZ BAND: REVIEW OF THE 2 GHZ TELEVISION OUTSIDE FREQUENCY BAND PLAN

References

- A. Replanning the 2 GHz band: Review of the 2 GHz Television Outside Broadcast Frequency Band Plan – Consultation paper
- B. Draft Radiocommunications (Television Outside Broadcasting) (2010-2110 MHz and 2200-2300 MHz) frequency Band Plan 2022
- C. Television Outside Broadcast (1980-2110 MHz and 2170-2300 MHz) Frequency Band Plan 2012
- D. Australian Radiofrequency Spectrum Plan (ARSP) 2021

1. Defence thanks the ACMA for the opportunity to provide a response to the 2 GHz frequency band replanning process.
2. Defence is highly supportive of the ACMA's key priority to manage spectrum efficiently and effectively for the benefits of all Australians, and acknowledges the utmost importance that the ACMA's decisions are guided by the objects of the Radiocommunications Act 1992 which promotes the long-term public interest derived from the use of the spectrum by managing the spectrum in a manner that facilitates the use of spectrum for defence, national security and other non-commercial purposes.
3. Defence supports the ACMA's effort to improve readability of the TOB frequency band plan (Ref. C) by removing outdated time references which will generally lead to clear and concise legislative instruments and reflect contemporary legislative drafting practices.
4. Defence understands that the initial intention for the proposed changes to the TOB frequency band plan (Ref. B) was to '*give effect to the same arrangements for these frequencies as are specified in the current TOB band plan*' as elaborated in the consultation paper (Ref. A). However, during the drafting process of legislative instruments and in order to adopt contemporary legislative drafting practices, the arrangements for primary services already established under the current TOB frequency band plan (Ref. C) have been either removed or downgraded.
5. Firstly, Section 9 of the current TOB frequency band plan (Ref. C) lists the purposes for which the 2010-2110 MHz and 2200-2300 MHz frequency bands may be used. Of particular interest for Defence is paragraph 9c which effectively allows any service, allocated in the ARSP (Ref. D), to operate in the 2010-2110 MHz and 2200-2300 MHz frequency

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bands. According to the ARSP (Ref. D), FIXED and MOBILE services are allocated to the 2010-2025 band, SPACE OPERATION (Earth-to-space) (space-to-space), EARTH EXPLORATION SATELLITE (Earth-to-space) (space-to-space), FIXED, MOBILE, SPACE RESEARCH (Earth-to-space) (space-to-space) services are allocated to the 2025-2110 MHz and 2200-2290 MHz bands and FIXED, MOBILE and SPACE RESEARCH (deep space) (space-to-Earth) are allocated to 2290-2300 MHz band. Note that all services in the 2010-2110 MHz and 2200-2300 MHz bands are allocated on the primary basis.

6. Further, Section 8, Part 1, Chapter 1 of the ARSP (Ref. D) clearly identifies the order of frequency band plans vs allocations in the ARSP (Ref. D) by clarifying that *'the frequency band must be used only for the purpose specified in the frequency band plan'*.

7. By omitting Section 9c in the draft TOB band plan and in conjunction with Section 8, Part 1, Chapter 1 of the ARSP (Ref. D), Defence understands that the operation of primary services such as MOBILE, FIXED, SPACE OPERATIONS and etc. would no longer be allowed under the draft TOB band plan (Ref. B). As the ACMA is aware, Defence has significant presence in these frequency bands across Australia, and has considerable investment in future planned radiocommunications devices operating in 2010-2110 MHz and 2200-2300 MHz band. Therefore, any change to the current arrangement would not be acceptable for Defence.

8. Secondly, section 11 of the current TOB band plan (Ref. C), further clarifies the arrangements for earth and earth receive station in the 2025-2110 MHz and 2200-2300 MHz frequency bands respectively. This section only forbids their operation on a primary basis in the Perth area after 31 Dec 2015 whilst the same section in conjunction with section 9c (Ref. C) permits operation of earth and earth receive stations outside the Perth area on a primary basis. This arrangement has enabled Defence to operate numerous earth and earth receive stations supporting internationally recognised and harmonised SPACE OPERATION service in these bands across Australia.

9. Section 7 paragraphs 1c and 2c of the draft TOB band plan (Ref. B) however permits only operation of earth and earth receive stations on a secondary basis in the 2010-2110 MHz and 2200-2300 MHz frequency bands across Australia whilst forbidding their operation in the Perth area. This change would not be acceptable as Defence operates earth and earth receive stations in these bands across Australia supporting critical services. It is essential for these services to continue to operate on a primary basis and be adequately protected for indigenous Australian capabilities and for Defence's international support toward allies and partners.

10. Finally, Defence highly appreciates the support from the ACMA's staff via phone conversations regarding the concerns raised, viz. Replanning the 2 GHz band, on the provided assurance that as outlined in the consultation paper, the ACMA's intention of the proposed new draft TOB band plan is to give effect to the same arrangements in the 2010-2110 MHz and 2200-2300 MHz frequency bands as are specified in the current TOB band plan (Ref. C). The ACMA staff further confirmed via email that earth stations operating outside the Perth area will continue to operate on a primary basis (as is the case in locations such as Tidbinbilla, Mingenew and New Norcia) as well as other services specified in the ARSP (Ref. D) are still supported, in accordance with subsection 9c of the current TOB band plan (Ref. C).

11. Defence understands that the frequency band plans would be redrafted to reflect contemporary legislative drafting procedures as well as retain all arrangements supported by the current TOB band plan. Defence would like to thank you on your responsiveness on this

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matter and would like to offer our further assistance should this be required during the redrafting process.

12. My point of contact is Dr Snezana Krusevac on (02) 5130 1169 or via email snezana.krusevac@defence.gov.au.

Yours sincerely

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