

Paul Tiffany,


Tuesday, July 19th, 2022.

Re: Extending spectrum availability for LPON services.

Please find attached my submission to the June 2022 consultation paper.

Question 1

Are there any alternative broadcasting or non-broadcasting uses of the sub-band spectrum (87.5–88.0 MHz) that we should be aware of?

We feel that the current standing of the 87.5 to 88.0 MHz band is satisfactory as it is. The current use has a place to play as a base level service.

Question 2

Should we make a new determination for LPON services later this year to extend the availability of spectrum for LPON services beyond 31 December 2025?

Yes, an extension on the availability past the end of 2025 should be made.

Question 3

If the answer to question 2 is 'yes', what would be an appropriate duration for the determination?

We feel that an appropriate duration should be for ten years.

Question 4

How often should we conduct our periodic reviews on spectrum availability for LPON services?

Reviews on the availability should also be on a ten-year rotation.

We would also like to briefly add the following, which could be included in a separate review.

1. Removal of the residential / non-residential zoning with 10 watts being a standard output in all areas.
2. Review of the "big broadcasters" with 10 plus LPON licences. Some of these services would be better served with main band presence and the associated power that enables.

Thanking you for your time.



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