

The Manager
Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Dear Sir/Madam

Airservices response to the new interim arrangements for remotely piloted aircraft systems in 5055–5065 MHz band consultation.

Thank you for the opportunity to provide comments on the new interim arrangements for remotely piloted aircraft systems (RPAS) in 5055–5065 MHz band consultation. Emerging aviation technologies are a key focus of Australian government policy. This includes RPAS and advanced air mobility that will help drive efficiency and new business opportunities.

Airservices Australia (Airservices) is a government-owned organisation providing safe, secure, efficient and environmentally responsible services to the aviation industry. Airservices provides the aviation industry with telecommunications, aeronautical data, navigation services and aviation rescue firefighting services. We also manage the use and allocation of the aeronautical frequency bands in Australia on behalf of the aviation industry.

The Control and Non-Payload Communication (CNCP) link is the data link between the RPAS and the remote pilot station for the purpose of managing flight. The CNCP link performance must be adequate to not only allow the remote pilot to safely fly the RPAS but also meet the other airspace performance requirements to support operational requirements and separation standards.

The International Civil Aviation Organization (ICAO) Handbook on Radio Frequency Spectrum Requirements for Civil Aviation ([Doc 9718](#)) highlights the need for protection from harmful interference to support safety-critical aeronautical communication, navigation and surveillance systems. The RPAS CNCP link is a safety critical link and has been assigned an aeronautical mobile (route) service (AM(R)S) allocation. AM(R)S is reserved for communications relating to safety and regularity of flight.

The interim arrangements as described in the Draft RALI proposes to apply special condition 27 on these licences. Special condition 27 does not afford protection to the licences that it is applied to. It is our view that the CNCP link is safety critical link required for control of the aircraft and separation from other aircraft in the airspace. Given this, we consider it appropriate that spectrum used to deliver safety of life service is afforded protection under the licence conditions.

The proposed channelling arrangement in the Draft RALI allows for 40 channels. Whilst there will be a reuse factor, there are concerns that 40 channels will be insufficient. A broad expectation is that RPAS movements will overshadow Air Traffic Management movements by a factor of 10.

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Airservices is required to endorse assignments of aeronautical or aircraft frequencies. The Radiocommunications Determination 2015 defines what an aeronautical licence is. The CNCP link that is being consulted on meets that definition. However, the Airservices spectrum management database is only set up for frequency bands in (and around) the aviation VHF band. We will need to modify that system to allow for the endorsements of channels in the 5GHz band. As such, we would appreciate as much notice as possible before this draft RALI is finalised to allow us sufficient time to update our system and thus avoid any delays in endorsing assignments.

Please do not hesitate to contact Matthew Kelly (matthew.kelly@airservicesaustralia.com) should you require any further information.

Yours sincerely

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CNS&A Lifecycle Management
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