



TELSTRA CORPORATION LIMITED

Proposed Telecommunications Mobile Equipment Air Interface Standard and consequential amendments to associated instrument

Public submission

September 2022

General



01 The proposed Air Interface Standard 2022

We welcome the opportunity to provide our comments to the Australian Communications and Media Authority (ACMA) in response to a proposal to make a new Telecommunications (Mobile Equipment Air Interface) **Technical Standard 2022** (the proposed Air Interface Standard 2022) to replace the existing **Telecommunications (Mobile Equipment Air Interface) Standard 2018** (the Air Interface Standard 2018).

We support the Technical Standard 2022 and the associated consequential amendments to the Telecommunications Labelling Notice for Customer Equipment and Customer Cabling Instrument 2015 (the Telecommunications Labelling Notice).

Telstra has been an active member of Communications Alliance working group that produced the Australian 5G industry standard (Communications Alliance S042:2022). We support adoption of the Communications Alliance S042.1 (2022), S042.4 (2022) and the new S042.5 (2022) into the new standard. We agree with the ACMA's position that *"requiring compliance with these standards ensures that the supply of 3G, 4G and 5G customer equipment in Australia meets the legislative objectives of access to emergency call services, protects the health and safety of persons, and protects the integrity of, and interoperability of customer equipment with, telecommunications networks."*

We provide our responses to specific questions below:

Question 1: Is it necessary and appropriate to mandate an industry standard for customer equipment with 5G technology?

Yes. In our view, it is both necessary and appropriate to mandate an industry standard for customer equipment with 5G technology to ensure that all industry players are held to a minimum standard for RF compatibility, network integrity and interoperability. 5G is a new technology that adds significantly more bands and is more complex. Therefore, it is appropriate for a minimum standard to be maintained.

Question 2a: If a mandatory industry standard is required, is the proposed Air Interface Standard 2022, which will mandate Communications Alliance's new S042.5 (2022) technical standard for 5G CE appropriate?

Yes. We believe the proposed standard is appropriate at present.

Question 2b: Is Communication Alliance's new S042.5 (2022) technical standard the appropriate technology-specific industry standard for 5G customer equipment in Australia?

Yes, S042.5 ensures that Australia's regulatory requirements are aligned and consistent with the equivalent standards for other jurisdictions, such as Europe and the USA, so that Australia can take advantage of economies of scale and minimise any impost to industry and customers.



Question 3: Do you have comments on the proposal to reduce the default 2-year ACMA transition period to a one-year default transition period in the proposed Air Interface Standard 2022?

We support a transition period of 12 months for the proposed Air Interface Standard 2022, based on changes introduced for Parts 1 and 4. Currently, there is no technical standard for 5G CE, so the earliest introduction of the standard provides clarity to the customer equipment industry.

Question 4: Do you have any other feedback on the proposal to make the new Air Interface Standard 2022 or the consequential changes to the Telecommunications Labelling Notice?

No other comments.