

Aqura Technologies Response to ACMA Options Paper

Replanning of the 1880–1920 MHz band March 2023

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DOCUMENT REVISION HISTORY

Revision History				
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1	Final version	LB/MR	LB	17Mar23

Table 1: Revision History

DISTRIBUTION LIST

Distribution List		
Name	Position/Title	Controller/Approver/ Informed

Table 2: Distribution List

REFERENCE DOCUMENTS

This document is intended to be read in conjunction with the following

Reference Documents	
Document Number	Description
ACMA	Replanning of the 1880–1920 MHz band Options Paper

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Introduction

Aqura is a specialist in the design, delivery, operation, and support of Private LTE and 5G industrial networks across Australia. Aqura has either been responsible for, or involved in, or supports a significant majority of Private LTE and now 5G deployments that are in operation across Australia. We have a solid grounding in the delivery of 4G and have delivered multiple Private 5G networks in Australia. Our networks are found across Australia and serviced by in-house specialists with extensive experience in broadband wireless technologies and their use in carrier and industrial environments.

Aqura represents broader enterprise and has extensive experience, and awareness of the importance of the licensing regime as it relates to some public sector, industrial and enterprise networks, with specific focus on LTE and 5G networks in all regions of Australia.

Aqura support the ACMA's preference for option 4 and the introduction of new services in the band. We note that incumbent users both in and adjacent to the band should be afforded protection from new services introduced in the 1880-1920 MHz band.

Desirable planning outcomes for the 1.9 GHz band

Question 1

The ACMA invites comments on the proposed desirable planning outcomes.

Aqura support the listed five desirable outcomes on p.20-21. As mentioned in the quoted ECC Report 318, there is the possibility of interference from high power FRMCS base stations into mobile network base stations receiving in 1920 -1980MHz band. This will require further investigation.

Question 2

The ACMA seeks stakeholders' views on any other applications we have not identified that could be accommodated under SR WBB.

Aqura have not identified any other applications under SR WBB.

Question 3

The ACMA invites comments on the replanning options, especially the preliminary preferred option presented in this paper (see p.36) and any alternative options.

Aqura align with the ACMA's preliminary preference for option 4. There is a concern of interference into adjacent band IMT services.

Question 4

Is personal handy phone system (PHS) technology still required to be included in the cordless communication devices class licence?

Aqura are not aware of any PHS systems operating in Australia and many PHS deployments overseas have been shut down.

If no other submission identifies any active PHS networks, PHS should be removed from the cordless communication devices class licence.

Question 5

The 1900–1920 MHz frequency band plan will sunset on 1 April 2023. Is the band plan still required, or can the band plan be allowed to sunset?

Aqura support allowing the band plan to sunset.

Question 6

The ACMA invites comments on coexistence considerations, and analysis on coexistence issues for the proposed options in this band.

There is a concern of interference from the 1900-1920 MHz band into the 2.1 GHz band uplink as mentioned in ECC Report 318. Further investigations into potential interference, mitigations and licence conditions should be done.

The onus should be on the FRMCS operator to limit any harmful interference into the adjacent IMT bands.