

Boeing Australia Holdings

response to

ACMA Review of scientific licensing arrangements

Boeing Australia Holdings (Boeing Australia) representing our various domestic subsidiaries including Boeing Aerostructures Australia, Boeing Defence Australia, Insitu Pacific and Jeppesen Australia commend the ACMA for the consultation on scientific licensing arrangements and the proposed Radiocommunications (Science and Research) Class Licence 2023.

The move to convert non-assigned scientific licensing to a class licence is a welcome and highly supportable initiative. This also aligns with provisions of other administrations to support radio frequency equipment testing and research.

This consultation does not go into detail about the future of assigned scientific licensing in Australia. Presently, as noted in the consultation paper, 'the only part of the Scientific LCD that applies to assigned scientific stations is section 8, which relates to use of call signs in some circumstances.' It is therefore assumed ACMA will continue to provide assigned scientific licences in a manner similar to what exists now. If so, there appears to be no direct legislation that supports the issuing of scientific licences for assigned radiofrequency testing beyond the general provisions of the Radiocommunications Act 1992 and the Licence Condition (Apparatus Licence) Determination 2015. Some clarity on this way forward would be appreciated.

The consultation paper asks a series of questions, mostly on the proposed draft Radiocommunications (Science and Research) Class Licence that is intended to replace the existing Radiocommunications Licence Conditions (Scientific Licence) Determination 2015 sunsetting in October 2025. Boeing Australia has provided some brief responses to the issues for comment in the attachment below.

Once again, Boeing Australia commends the ACMA for proposing this way forward for scientific licensing of radio frequency equipment testing and research in Australia.

Respectfully submitted



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Attachment

Boeing Australia responses to issues for comment from the ACMA Review of scientific licensing arrangements consultation paper

ACMA issue for comment	Boeing Australia response
<p>1. Are the existing conditions in the Scientific LCD for the operation of land stations and mobile stations appropriate? Are there any updates we should consider if we replicate these conditions in a class licence?</p>	<p>Noting that these conditions replicate current usage it nonetheless covers a limited frequency range for land and mobile stations and perhaps access to other frequencies across the mobile service may serve broader future experimentation and testing.</p> <p>Recognising assignments to Department of Defence, Airservices and emergency services such as RFDS should be avoided.</p>
<p>2. Are the existing conditions in the Scientific LCD for ultra-wideband technology appropriate? Are there any updates we should consider if we replicate these conditions in a class licence?</p>	<p>The UWB Frequencies stipulated in Schedule 2 of the proposed scientific licence are very broad.</p> <p>Boeing seeks ACMA's view on ensuring protection of various safety of life allocations across this frequency range, for example 5 030-5 091 MHz allocated to protect aeronautical services.</p> <p>Does the ACMA consider the power level restrictions and conditions across the frequency range are sufficient to protect safety of life spectrum allocations in the same frequency range?</p>
<p>3. The proposed class licence makes some minor changes to the provisions of the Scientific LCD, such as expressly providing for additional activities (repair and maintenance), and providing that people may operate devices in shielded enclosures as well as screened rooms. Are there any other updates we should consider?</p>	<p>This is a key change to the current provisions whereby shielded enclosure and dummy load operations are no longer required to take out a scientific licence.</p> <p>The fact that no interference issues under the current arrangements have been reported to ACMA supports this initiative.</p> <p>The administrative and operational benefits support productivity and access to testing and experimentation of new radio communications equipment.</p>

ACMA issue for comment	Boeing Australia response
<p>4. Is the proposed class licence fit-for-purpose for the types of activities we are contemplating authorising? We welcome any comments on the form of the proposed class licence.</p>	<p>Boeing Australia supports the proposed class licence with minor exception of comments made at 1 and 2 and 5.</p>
<p>5. Should we amend relevant frequency band plans to allow for operation of scientific stations authorised by the proposed class licence?</p>	<p>It is noted the class licence presently will not authorise operation of devices in the following bands:</p> <p>1427–1535 MHz 1900–1920 MHz 1980–2110 MHz 2170–2300 MHz.</p> <p>ACMA infers it would amend these plans to ensure uniformity of the access to the class licence.</p> <p>Given the widespread use of non-assigned scientific licensing without recorded incidents of interference across much of the radio frequency spectrum, and consistent with the provisions proposed in the scientific class licences (reflecting existing conditions) it appears appropriate to amend the frequency bands to allow access to stations for scientific class licence purposes.</p> <p>Noting that there is limited effect for operators of scientific licences due to restrictions of transmissions to dummy loads or in shielded rooms apart from land, mobile and UWB of which it is only the latter that may possibly access these frequency bands. Also, ACMA states that under current provisions ‘there was no reported use of UWB technologies’ it questions the limited utility to be gained from changes to the radiofrequency band plans.</p>
<p>6. Are there any other domestic or international arrangements for experimentation or trials (radiocommunications or otherwise) that we should examine?</p>	<p>No comment</p>

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<p>7. The ACMA recently reduced taxes by 50–90% for assigned licences above 5 GHz as part our implementation of the Spectrum Pricing Review, which we consider makes scientific assigned licences more accessible, especially for services with large bandwidths. Is there still interest in the concept of a short-term trial licence, issued on a non-renewable, minimum tax basis? If so, what types of trials could it facilitate? We are specifically interested in technology types, and technical parameters (for example, frequency ranges, power levels)</p>	<p>For assigned scientific licences ACMA should be open to licence terms not restricted to 12-months only.</p> <p>Noting the FCC uses a variety of durations such as Special Temporary Authorisations for 6-months.</p> <p>Without providing detail there are uses where for example, UAS testing may not be required for a 12-month duration and a 6-month licence would be sufficient.</p> <p>Further, for certain radiolocation or satellite applications it may readily be useful to have a licence beyond 12-months to accommodate ongoing development.</p> <p>In both examples there are efficiencies and economies of scale of benefit to industry.</p>