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The Manager  
Major Spectrum Allocations Section,  
Australian Communications & Media Authority,  
PO Box 13112,  
Law Courts Melbourne Vic 8010

### **Comments on Area-wide apparatus licences in the 3.8 GHz band in metropolitan and regional Australia**

DB Telecommunications Pty Ltd has been providing ACMA Accredited Frequency Assignment services to a range of commercial and government clients since 1998. The assignment services provided by the company cover land mobile, fixed link and WBB services across a broad range of frequency bands for clients in industries including Government, Emergency Services, Mining, Transportation, Manufacturing and Communications Service Providers

The company has significant experience assisting organisations with the planning of spectrum requirements for WBB services, including applications for AWLs in the 28 GHz band.

DB Telecommunications Pty Ltd is pleased to be able to offer some brief comments on the spectrum allocation processes issues proposed in the ACMA's consultation paper.

### **Technical Framework**

DB Telecommunications supports the proposed technical framework for AWLs in the 3.8 GHz band.

### **Allocation Process**

Of the two allocation options proposed by the ACMA, DB Telecommunications prefers Allocation Option 1.

A key driver behind the ACMA's decision to provide apparatus licensed spectrum in 3800 – 4000 MHz in metropolitan and regions, was recognition of the growing demand for mid-band spectrum to support the emerging market for private LA WBB systems.

DB Telecommunications believes that Option 1 provides the best mechanism for the ACMA to give priority to LA WBB use cases.

To date the lack of available mid-band spectrum and the limited equipment options available to support some LA WBB solutions, e.g., readily available 5G SA solutions in some bands, has making it difficult for organisations to finalise their business cases and implementation plans for LA WBB systems. DB Telecommunications suspects that many of these organisations may not have their business cases and implementation plans ready when the AWL initial allocation window opens and may require additional time to submit their AWL applications.

It is for this reason that DB Telecommunications does not favour Option 2 which even with an initial 4-week allocation, may not allow enough time to give priority to LA WBB use cases.

With regard to Option 1, DB Telecommunications would favour the adoption of a second priority allocation round at the conclusion of the first round, rather than simply opening it up to first in time applications. This would give the ACMA another opportunity to give priority to LA WBB use cases, for those organisations that had struggled to complete their business cases and planning within the initial allocation window.

### **Allocation Limits**

Because of the likely pent-up demand for mid band spectrum for LA WBB Applications, DB Telecommunications would favour a quantum allocation limit of 50 MHz in metropolitan areas. The quantum allocation limit of 70 MHz in regional areas, due to the likely lower number of potential licensees in these areas.

To allow a reasonable amount of time for the LA WBB industry to fully develop following the initial release of 3.8 GHz spectrum, the nil MHz limit should apply for a minimum period of 12 months.

DB Telecommunications supports cross-band limits of 140 MHz in metropolitan areas and 160 MHz in regional areas in the 3.4–3.95 GHz band.

However, to provide plenty of future spectrum for the emerging LA WBB industry, DB Telecommunications believes that these cross-band limits should be permanent, rather than simply applying for a 3month, 6 month or 12-month period.

### **Questions from the ACCC**

#### **Use Cases**

DB Telecommunications will leave it to those organisations on the supply-side to elaborate on the likely use cases.

#### **Downstream Markets**

DB Telecommunications will leave it to those organisations on the supply-side to elaborate on the likely downstream markets.

## **Alternative Spectrum**

Because of the embargoes that apply to the 1800 MHz, 2 GHz and 3.6 GHz bands in metropolitan and regional areas, DB Telecommunications does not believe that there is any readily substitutable spectrum exists for the 3.8 – 3.95 MHz band.

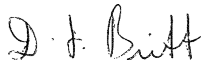
## **Pricing**

DB Telecommunications is satisfied with the proposed pricing model for spectrum in the 3.8 GHz band.

DB Telecommunications wishes to thank the ACMA for the opportunity to respond to this consultation paper and looks forward to being able to elaborate on the comments made in this submission, if required.

If you would like additional information or wish to discuss any aspect of my submission, please do not hesitate to contact me on (03) 9331 3170 or by email [dbritt@dbtelecomm.com.au](mailto:dbritt@dbtelecomm.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. J. Britt'.

David Britt  
Director