



10<sup>th</sup> May 2023

The Manager,  
Spectrum Licensing Policy,  
Australian Communications & Media Authority  
PO Box 13112,  
Law Courts,  
Melbourne Vic 8010

**Reference: Draft Five Year Spectrum Outlook (FYSO)**

The Australian Radio Communications Industry Association (ARCIA) represents the Land Mobile Radio (LMR) industry in Australia, often referred to as the two-way radio industry or in more modern parlance the ‘wireless communications industry’. For around seventy years our members have been designing, installing, and maintaining private communications networks for users across virtually every industry sector of Australia, and we will continue to do this into the future as the demands for private networks spread out from the traditional Wireless Broadband (WBB) markets. The clients of our members are a critical part of the Australian economy and make significant contributions to both the gross domestic product (GDP) of the economy as well as employ thousands of Australians.

As we read through the FYSO planning outlines we find there are several areas on which we wish to comment –

1. On pages 14 and 30, as well as at other sections during the draft document, there is reference to other regions of the world communications bodies that are indicating they believe that portions of the 600 MHz bands should be allocated for wireless broadband (WBB) use. Although we recognise that this might be suitable in some areas of the world, we would sincerely hope that as the APT representatives at WRC23 highlight the following which applies to our national interests –
  - In the spectrum segment between 450 – 520 MHz there are presently around 52,300 valid licenses for services of several different types.
    - 450-470 MHz – close to 28,300 services
    - 470-500 MHz – close to 18,000 services
    - 500 – 520 MHz – around 6,000 services
  - With the reports from equipment vendors on the continuing high levels of product shipments of digital technology products in the LMR bands, it is highly likely that most of these services will be operated by relatively new equipment with several years yet before end-of-life considerations.
  - As with most of the services in this band being either ‘mission critical’ or ‘business critical’ in operating format, alternative communications technologies are not yet proven to meet the same high performance or reliability standards.
  - Here in Australia the UHF CB frequencies are in the 470-500 MHz segment and that will have many thousands of units operating under the class license, this would make it particularly difficult to conduct a re-allocation plan to move all these devices, many of which could be providing some limited form of essential service.



Given these factors, we would sincerely hope that the Australian representatives will argue strongly for retaining the spectrum below 520 MHz for existing allocations and utilisation in our Region, the markets in these areas are still strong and not showing any appreciable reduction in popularity. Tentative indications from some suppliers in recent years that they may consider ceasing manufacture of product models for frequencies above 470 MHz would now seem to be no longer the case.

2. On pages 15 and 29 there is reference to planning under way for Local Area Wireless Broadband (LA-WBB) now becoming part of the planning process to permit Private WBB networks around Australia, we commend the ACMA on recognising that there is demand for private networks such as this and by making spectrum allocations in mid-band spectrum the way is opening up for this new market initiative and increasing the public benefit from spectrum.
3. We support in principle the outlines concerning the following items –
  - The preliminary re-planning outline for the 1.9 GHz band
  - The review of the Scientific License system and move towards utilising Class Licensing
  - The enquiry regarding permitting access to the marine VHF frequencies by LMR equipment under emergency situations
  - We support the plan to review the conditions regarding the RNSS equipment
  - We endorse the plan for discussion around the 4.9 GHz class licensing system later this year, this will become a band that will become higher in demand as agencies become more aware of the benefits being gained from WBB and having a set spectrum segment like the 4.9 GHz band will become an important asset in critical communications.
4. We will be interested in the review of the Telecommunications cabling programs, although not directly involved in these discussions, most of our members have staff who are required to be licensed under the system and we will be watching to see what the future may hold.
5. With the indications that there are ongoing reviews regarding the 6 GHz band we will also welcome involvement in those discussions as they develop. We believe that there are some external interests involved in the discussions and it must be kept in mind that the public carriers are actively utilising public Wi-Fi spectrum to improve their network performance rather than investing to extend the capacity or coverage footprints of their systems. We are not sure whether these competing interests should be influencing any discussions or outcomes?

We thank the ACMA for the opportunity to respond to the FYSO planning outlines, with our long history of providing private network communications systems we have much to offer in these discussions and we feel that the input from enterprise or private LTE markets has not been given sufficient voice in the past. As always, our Association is willing to be involved and outline our contributions in discussion at any stage, our continuing position is that there should be transparency of all spectrum related decisions, plus the consideration of all applications for spectrum usage without revenue being the sole arbiter of public benefit.

Yours sincerely,  
Australian Radio Communications industry Association (ARCIA) Inc.

Ian Miller – Spectrum & Technical Officer