



ARA Submission

Five-year spectrum outlook
2023–28 and 2023–24 work
program

Draft for Consultation

12 May 2023

ABN 64 217 302 489

The rail industry

The Australasian Railway Association (ARA) is a not-for-profit member-based association that represents rail throughout Australia and New Zealand. Our members include rail operators, track owners and managers, manufacturers, construction companies and other firms contributing to the rail sector. We contribute to the development of industry and government policies in an effort to ensure Australia's passenger and freight transport systems are well represented and will continue to provide improved services for Australia's growing population.

This submission has been developed in consultation with ARA member organisations.

Any questions regarding this submission should be directed to Joeley Pettit, Director Corporate Affairs, Passenger Rail and Sustainability via [REDACTED].

Australia's rail industry

Rail is a significant industry in Australia, creating economic activity through its operations and capital investments. It is an industry with activities across every major metropolitan and regional area and is supported by the full spectrum of skills in the Australian workforce.

In 2019, the rail industry contributed around \$30 billion to the Australian economy and employed more than 165,000 workers (directly and indirectly in full-time equivalent terms, FTE). The industry is made up of around 900 businesses that are located in approximately 20 major hubs.

General Comments

Railways use spectrum as an essential part of providing safe and efficient rail services for passengers and freight.

ARA members have an interest in current 1800 MHz licences; replanning of the 1.9 GHz band; changes to class licenced bands including ITS; radionavigation services in tunnels; as well as other spectrum bands that provide radiocommunication between railway assets and rolling stock.

Rail operators and providers need significant lead time from the ACMA on spectrum decisions and allocations impacting safety-critical functions of rail systems.

Specific comment on the ACMA's Draft FYSO and work program

The following information is provided by the ARA to address the proposed FYSO and work program presented in the Draft FYSO for Consultation.

Expiring spectrum licences and use

1800 MHz License Renewal

In the draft FYSO, the timeframe for 1800 MHz spectrum licence renewal is unspecified. Consultation discussed in relation to multiple expiring licences (including the 1800 MHz licences) on pages 63 to 65 discuss a proposed four stage process.

The ARA welcomes consultation regarding expiring 1800 MHz spectrum licenses and encourages the ACMA to begin consultation as early as possible with rail spectrum holders to ensure jurisdictions have sufficient time to budget and plan should any changes be required.

The ARA understands that the ACMA may have regulated processes regarding expiring spectrum licences that may be challenging for rail jurisdictions to meet. The ARA encourages early dialogue with the rail industry concerning spectrum – especially re-issuing of 1800 MHz spectrum licences.

ARA members holding 1800 MHz spectrum licenses would have concerns that 'efficient use' criterion would negatively impact their ability to have spectrum re-issued - especially when deployment of international standardised railway telecommunication systems require spectrum allocations not available in Australia. Changes to how spectrum is re-issued should not be retrospective and impact existing licence holders.

1900 MHz Re-planning

The ARA encourages the ACMA to make an early decision on replanning the 1.9 GHz band to provide the rail industry with certainty and sufficient time to incorporate any changes into their transport networks.

The ARA supports an outcomes paper by Q4 2023¹ which enables rail operators and providers to confirm migration planning as FRMCS products become available.

¹ ACMA, Five-year spectrum outlook 2023-28 and 2023-24 work program, draft for consultation, March 2023, page 42

Spectrum and arrangements for innovative applications

In the draft FYSO, an outcome of the review of the banned equipment and exemptions framework is the ability to licence a wider range of radionavigation-satellite service (RNSS) technologies that generate or retransmit RNSS signals.²

The ARA considers work related to radionavigation-satellite services (RNSS), especially in tunnels, to be of significant interest and encourages the ACMA to continue efforts in developing standards and suitable licences for operation of this class of systems.

Monitoring stage

The ARA appreciates the ACMA's open invitation to raise relevant development issues impacting operation of radiocommunications for rail signal and control systems.

The ACMA's willingness to engage with the Australian rail industry on matters of spectrum, radiocommunication technology, and interference protection ensures rail operators can respond to and take advantage of international developments and global standardisation of systems and products.

Intelligent transport system

The ARA supports introduction of ITS class-licensed band as this may be useful to support interfaces between rail and road such as level crossings. This would provide additional advanced warning to drivers concerning level crossing signal indication. Current licence conditions might not be suitable for safety critical applications given it does not restrict use to only road authorities. The ARA encourages the need for further investigation of the intelligent transport system class licence band subject to international developments.

² ACMA, Five-year spectrum outlook 2023-28 and 2023-24 work program, draft for consultation, March 2023, page 24.