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5 May, 2023

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
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Comments on Draft Five Year Spectrum Outlook 2023-28 and 2023-24 Work Program

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

DB Telecommunications is pleased to be able to offer some brief comments on the Draft Five Year Spectrum Outlook 2023-28 and 2023-24 Work Program.

600 MHz Band

DB Telecommunications notes that on pages 30 and 31 of the document that the ACMA outlines that it is monitoring developments at the World Radiocommunication Conference (WRC) and other Asia-Pacific forums, regarding the possible use of the band 470 – 698 MHz for future IMT/WBB purposes.

DB Telecommunications fully supports the comments made by the Australian Radio Communications Industry Association (ARCIA) in a separate submission, regarding the importance of the 400 MHz band, specifically 450 – 520 MHz, to many sectors of Australian industry.

Probably around 80% of the frequency assignments performed by DB Telecommunications involve the 400 MHz band.

From its frequency assignment activities, DB Telecommunications knows that 400 MHz spectrum is extremely scarce in many inner metropolitan areas around Australia and that there is unlikely to be sufficient spare spectrum to accommodate services displaced from 470-520 MHz, due to any proposed introduction of IMT/WBB services in that part of the 400 MHz band.

DB Telecommunications does not see demand for 400 MHz spectrum from the land mobile communications industry decreasing significantly in the next 10 years.

DB Telecommunications would urge the ACMA to resist any attempts by the WRC or other forums to designate the segment from 470 – 520 MHz for IMT/WBB purposes in our region for the foreseeable future.

Forward Allocation Workplan – 3400 – 4000 MHz

DB Telecommunications fully supports the various activities planned for the various segments of the 3400 – 4000 MHz band, as proposed in the forward allocation workplan.

As noted in its recent comments on the 3.4-3.7 GHz Band Auctions Consultation, DB Telecommunications sees a need for the ACMA to develop clearer definitions to distinguish between local-area WBB services and restricted cell LA WBB services proposed for 3950 – 4000 MHz, when developing future consultation papers, applicant information packs and RALIs for the 3400 – 4000 MHz band.

This will provide industry participants with clearer information on exactly which type of services are intended for each of the segments in 3400 – 4000 MHz, particularly in relation to AWLs.

Expiring spectrum licences and use

DB Telecommunications notes the ACMA's comments on p14 of the consultation paper regarding the possible refarming of 3G spectrum for possible 5G applications.

When developing the proposed Q2/2023 consultation regarding the expiry existing spectrum licences across the 700 MHz, 850 MHz, 1800 MHz, 2 GHz, 2.3 GHz, 2.5 GHz and 3.4 GHz bands, DB Telecommunications believes that it will be important to consider allocating some of that spectrum for private network purposes under AWLs, for instance, rather than simply making all the spectrum available through a spectrum licensing auction.

Over the past few years DB Telecommunications has observed a strong demand for spectrum in the 1800 MHz and 2 GHz bands in metropolitan and regional areas, for the implementation of private networks, demand that was not able to be satisfied despite the ready availability of suitable equipment in those bands, due to the lack of spectrum.

Spectrum management system

DB Telecommunications would urge the ACMA to advance plans for the replacement of its current Spectra spectrum management system.

DB Telecommunications and other organisations participated in research activities associated with the planning of the requirements for the new spectrum management system back in September 2021, but since that time there has been no information published by the ACMA on the current status of the system replacement.

The Spectra system is experiencing ongoing technical issues as evidenced by the recent need for regular weekend maintenance outages which appear to be increasing in frequency.

Assigned amateur beacons and repeaters

DB Telecommunications welcomes the ACMA's plans to hold a consultation on technical coordination arrangements for the assignment of Amateur repeater licences. The existing arrangements are slow and have become largely unworkable for APs and Amateur licensees alike.

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 [REDACTED] [REDACTED] [REDACTED] or by email [REDACTED]

Yours sincerely,

[REDACTED]

David Britt
Director