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The Manager
Spectrum Management Outlook and Strategy Section
Australian Communications and Media Authority
PO Box Q500
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3 May 2022

Response to Proposed spectrum re-allocation declaration for the 3.4 GHz and 3.7 GHz bands - IFC 10/2022

Dear Sir/Madam,

The Wireless Institute of Australia (WIA) thanks the ACMA for the opportunity to comment.

The WIA acknowledges the ACMA preference for Option 3 and the potential loss of secondary status in the 3400-3600 MHz frequency range for the amateur service. The WIA has significant concern at yet another example of the slow erosion of Amateur Service spectrum, however has anticipated this move as stated on page 22 of your options paper:

*“**Amateurs:** due to the increase in spectrum licensing in the 3400–3600 MHz frequency range over time, the Wireless Institute of Australia (WIA) has updated its [Amateur Band Plan](#) to limit amateur use in that frequency range. The WIA’s band plan now only defines specific arrangements within the 3300–3400 MHz frequency range. This band supports the same applications as previously deployed in the 3400–3600 MHz frequency range and is considered to be equivalent spectrum for amateur use.”*

Another concern the WIA has is that the loss of 3400-3600 MHz directly encroaches in the global amateur satellite segment at 3400-3410 MHz, denying Australian amateur space experimenters in the STEM community.

Even though the Amateur Service Band Plan has been able to accommodate the preferred ACMA option, the WIA has significant concern for the 3300-3400 MHz segment given there is significant amateur radio utilisation of this segment of the spectrum. Uses include microwave, earth-moon-earth, amateur television and narrow band weak signal experimentation. Given recent trends there is a distinct possibility of IMT applications expanding into this segment, excluding all other users.

The WIA is always open to discussions on these and any other spectrum issues affecting the Amateur Service, please contact the WIA Secretary (secretary@wia.org.au) to organise a meeting.

Your sincerely

Peter Clee

Peter Clee VK8ZZ
Secretary
Wireless Institute of Australia