



7th August 2023

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Reference: Approach to expiring spectrum licences - Consultation paper

The Australian Radio Communications Industry Association (ARCIA) wishes to present some thoughts for consideration as part of this discussion process. In general terms we are comfortable with the proposed process for treatment of the expiring licences, and we request that the discussion should consider all options and not just the direct replacement and renewal of the existing licences.

We do acknowledge that a significant portion of the renewal discussion must recognise the investment that the existing licensees will have in their networks, as such they cannot just be cancelled or re-allocated without consideration of those investments. In addition, the public will be holding devices designed to operate within those spectrum licences and will have an expectation of continued use of their own individual investments, this must be part of the 'Public interest' factor involved.

Our members provide significant numbers of private communications networks in multiple industry sectors, many of which are either 'Mission critical' or 'Business critical' in their design and operation. We believe that over time the need for private WBB networks is going to increase and that these will form part of both the economic benefit to Australia as well as meeting the public interest through downstream benefits, many of which are yet to be recognised within present WBB systems.

We suggest that there are two factors that should be kept in mind as the process to evaluate the options develops –

1. That the concept of public interest should extend beyond the MNO WBB services and consider also the benefits that could come from LA-WBB and private WBB networks.
2. That by the time the existing licences expire it is highly likely that technology will be working beyond 5G, and that bandwidths required for newer technologies might mean that existing licences may become too restrictive for MNO style WBB services at that stage. This could well mean that new band plans will have potential 'orphan' spectrum segments that will still be suitable for LA-WBB applications.

As always, we are pleased to have the opportunity to present our response to this discussion paper and would welcome the opportunity to expand on any of the thoughts presented herein.

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