



TELSTRA LIMITED

Submission to ACMA Consultation: Proposed Updates to RALI FX23:

Public Submission

20 Oct 2023



1 Introduction

We welcome the opportunity to make this submission to the Australian Communications and Media Authority's (ACMA) consultation on the **Proposed Updates to RALI FX23**.

Overall, we support the ACMA's proposed updates to RALI FX23. Our submission, however, makes one recommendation.

2 Remove the Licence Definition Area from RALI FX23

The consultation paper explains that section 3.2bis of RALI FX23 was developed to preserve options for the migration of 3.6 GHz PMP licences to the 5.6 GHz band as an interim arrangement in 2018. This arrangement enabled wireless ISPs (WISPs) and other operators of point-to-multipoint (PMP) services in 3.6 GHz band to migrate to the 5.6 GHz band. Amongst other updates, this consultation paper proposes to remove the interim arrangements contained in section 3.2bis of RALI FX23.

We support this proposal.

Earlier on in RALI FX23 in the Assignment Rules section (section 2.2), the subsection on **Licence Area Definition** constrains the ACMA to only issuing PMP licences in geographic areas defined by the HCIS identifiers¹ defined in Annex B, and as illustrated in Figure 2 of RALI FX23. The area defined by Annex B matches the geographic boundary of spectrum licences operating in the 3.6 GHz band. We understand the reason for limiting the issuance of 5.6 GHz PMP licences to the areas defined by the 3.6 GHz spectrum licences was to preserve options for PMP operators who were required to migrate from 3.6 GHz in those areas.

Now that the ACMA is issuing AWLs in remote areas in the 3.4-4.0 GHz range, we consider that PMP operators in these areas could also benefit from the ability to move into the 5.6 GHz band. We appreciate that unlike the metro and regional areas defined by the 3.6 GHz band reallocation declaration, PMP operators in remote areas are not *required* to migrate to another band, as they are protected under first-in-time arrangements.

However, in the event PMP operators in remote areas need the flexibility to move to the 5.6 GHz band, the Licence Area Definition in RALI FX23 prevents this from occurring. The Licence Area Definition subsection says: "*PMP licences **can only be issued** in the 5600-5620 MHz and 5630-5650 MHz frequency ranges in the geographical area defined by a sequence of HCIS identifiers given in Annex B.*" [emphasis added].

We propose the subsection titled Licence Area Definition (in section 2.2), Figure 2 and Annex B of RALI FX23 be amended to include both regional and remote areas of Australia. This would provide flexibility for PMP operators in remote areas to move to the 5.6 GHz band as an alternative to their existing 3.6 GHz PMP licence.

¹ The HCIS is described in the *Australian Spectrum Map Grid 2012*. The *Australian Spectrum Map Grid 2012* is available on the ACMA website at: www.acma.gov.au. Copies are also available from the ACMA.