



**Australian Government**

**Department of Defence**

Chief Information Officer Group

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ACMA IFC 25-2020

The Manager  
Spectrum Outlook and Strategy Section  
Australian Communications and Media Authority  
PO Box Q500, Sydney, NSW 1230

## **IFC 25-2020 APPARATUS LICENCES IN THE 26 GHZ AND 28 GHZ BANDS**

### **References:**

- A. IFC 25-2020, Apparatus Licences in the 26 GHz and 28 GHz bands Consultation Paper, August 2020
  - B. Email 20200618 Re: Apparatus Licensing Scenarios for FSS in the 26/28 GHz band- Defence Response for TLG Informal (BO397750)
1. Defence appreciates the opportunity to comment on the proposed licensing arrangements in 24.25–29.50 GHz frequency range as provided in Reference A, in particular with respect to the impact to licences obtained in support of satellite services.
  2. As provided in Reference B, Defence has already raised technical and regulatory concerns regarding the issuance of Area Wide Licences (AWL) for authorising FSS Earth Stations and the ACMA has addressed some of the concerns by making necessary amendments to the framework.
  3. Defence holds a substantial number of Earth/Earth Receive licences issued in support of current and future satellite communications capabilities. In particular, tax-payer funded multibillion-dollar future space capabilities require absolute certainty in spectrum access. Therefore, the level of protection provided to existing licences must be maintained.
  4. Based on the information provided in this discussion Defence is yet to be convinced that AWL will provide additional benefits over current Earth/Earth Receive licences in achieving Defence and national security objectives. Therefore, Defence is of the view that ACMA should not preclude Defence from obtaining the Earth/Earth Receive licences in 27–30 GHz frequency range.
  5. Introduction of AWL for extended number of services and frequency bands should proceed only if the cost-benefit-analysis is acceptable to all stakeholders. In a frequency band such as 29.5–30 GHz, where satellite services are sole primary, there is no pressing need to implement AWL.

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6. My point of contact is Dr Tharaka Dissanayake on 02 5130 1849 or via email [tharaka.dissanayake@defence.gov.au](mailto:tharaka.dissanayake@defence.gov.au).

Yours sincerely

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