



Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

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SATELLITE DIRECT-TO-MOBILE SERVICES

To whom it may concern

The Australian Maritime Safety Authority (AMSA) thanks the Australian Communications and Media Authority (ACMA) for the opportunity to contribute to the spectrum tune-up in October 2023 on satellite direct-to-mobile services, and the opportunity to provide input on the regulatory framework for satellite direct-to-mobile services.

Whilst AMSA has no view on the suitability of the current domestic radiocommunication regulatory framework for satellite direct-to-mobile services, we encourage the ACMA to ensure broader regulatory and public-benefit implications, international regulatory arrangements, standards development and stakeholder engagement activities are considered prior to further action on satellite direct-to-mobile services.

Background

AMSA provides search and rescue (SAR) to anyone in distress, no matter where they are in the Australian SAR region¹, whether they be travelling by boat, aircraft, vehicle or on foot. AMSA has a statutory obligation under the *Australian Maritime Safety Authority Act 1990* to provide this service. AMSA also maintains a register (<https://beacons.amsa.gov.au/>) of beacon and maritime mobile service identities (MMSI) which helps in identifying and locating anyone in distress and managing inadvertent or malicious activation.

AMSA is also responsible for standards development and implementing regulation to apply carriage requirements on regulated Australian vessels (RAV)² and domestic commercial vessels (DCV)³, intended to ensure those vessels can meet the functional requirements for *inter alia* distress alerting, receiving and transmitting SAR communication and maritime safety information (MSI).

Maintaining regulatory and interference protection of distress and safety communication capabilities utilised by maritime and aeronautical users remains a priority for AMSA.

Considerations

The operational environment is changing, with recreational users and their adventurous behaviours driving innovation and commercialisation. These users seek one device to meet

¹ <https://www.amsa.gov.au/safety-navigation/search-and-rescue/australias-search-and-rescue-region>

² <https://www.amsa.gov.au/vessels-operators/flag-state-administration/what-regulated-australian-vessel>

³ <https://www.amsa.gov.au/vessels-operators/domestic-commercial-vessels>

all their communication and distress/emergency alerting requirements. This is accelerating the modernisation of global distress and emergency alerting systems, some of which may be captured by satellite direct-to-mobile services.

Our understanding is that current-generation MSS satellites and mobile phone capabilities may not be suitable for critical distress or emergency satellite direct-to-mobile services, or there is insufficient commercial desire to provide these services with high availability/coverage. This is evidenced by limitations of Apple's satellite direct-to-mobile services constellation⁴, and Qualcomm's recent decision to cease plans to develop chip-support for a satellite SOS feature for Android⁵.

It may therefore be premature to modify the current domestic radiocommunication regulatory framework for satellite direct-to-mobile services if the engineering does not stack up or realise tangible benefits for users.

Further, satellite direct-to-mobile services may have broader regulatory and operational impact on existing systems, the global, domestic and recreational maritime and aeronautical users, land-based users, and any international regulatory or standard development arrangements.

Whatever the impact is, or capabilities realised by satellite direct-to-mobile services, stakeholder engagement is required, particularly where those services are delivered by government. This should include:

- coverage (geography, including internationally),
- availability (reliability and redundancy),
- services (including 000 and 112, voice, text, data, etc.),
- who users talk or engage with during an emergency,
- limitations associated with international and domestic SAR regulation/convention, and
- costs involved (upfront and ongoing).

This engagement is not limited to the ACMA's remit and broadly covers a range of Federal and State entities.

Digital maritime services

The maritime industry is progressively embracing digital maritime services previously available in paper-based (i.e., charts) or text-based formats (navigational warnings and meteorological forecasts). There is also an increased focus on seafarer welfare and the benefits ubiquitous connectivity provides to the mariner.

⁴ <https://www.abc.net.au/news/2023-05-17/apple-iphone-emergency-sos-service-australia-phone-000/102345720>

⁵ <https://www.theverge.com/2023/11/10/23955416/qualcomm-snapdragon-satellite-shut-down-emergency-sos-iridium>

Noting existing internationally regulated maritime communication systems (MF/HF, VHF, L-band) do not have sufficient capacity to meet the requirements of digital maritime services, a direct-to-phone (or direct-to-ship) capability on a global basis may be a capability which could support some of these activities.

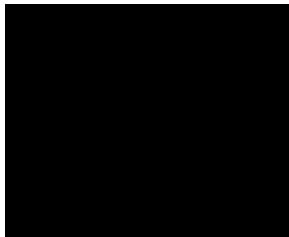
In this regard, AMSA is partnering with ports, industry and shipping to trial the satellite component of the VHF data exchange system (VDES) around the Great Barrier Reef and Torres Strait. This capability includes capability for the delivery of digital maritime services, and our demonstration is intended to prove the system in the Australian environment.

Conclusion

AMSA encourages the ACMA to ensure broader regulatory and public-benefit implications, international regulatory arrangements, standards development and stakeholder engagement activities are considered prior to finalising further actions on satellite direct-to-mobile services.

Please contact Stuart Shepard, Principal Advisor Maritime Communications, on [REDACTED] for further information on this submission.

Yours sincerely



Greg Pusey
MANAGER MARITIME SAFETY SYSTEMS
POLICY AND REGULATION

82 Northbourne Avenue, Braddon ACT 2612
GPO Box 2181, Canberra ACT 2601