

7 May 2024

**Shure's Comments to
Remaking the Radiocommunications (Cordless Communications Devices)
Class Licence 2014**

As a leading manufacturer of wireless audio equipment, including cordless microphones and in-ear monitoring systems, Shure appreciates the opportunity to provide feedback on the proposed remaking of the Radiocommunications (Cordless Communications Devices) Class Licence 2014 (the CCD class licence).

Wireless audio technology plays a vital role in a wide range of professional and consumer applications, from live performances and broadcast production to corporate events and educational settings. Therefore, it is essential that the regulatory framework governing cordless communications devices adequately addresses the unique requirements and challenges faced by the wireless audio industry.

DECT technology is also used in solutions designed by Shure for use in conference rooms, boardrooms, and other meeting spaces¹. They offer high-quality audio solutions that help to ensure everyone in the meeting can hear and be heard clearly, improving the overall effectiveness of the meeting.

Shure is a member of the DECT Forum and we strongly believe that DECT and DECT-2020 NR are future proof technologies.²

Shure would like to congratulate ACMA for the final positive decision on DECT and future use by

- maintaining DECT across 1880–1900 MHz and updating the arrangements to ensure support for 'future DECT' in 1880-1900 MHz (both indoor and outdoor applications).
- introducing 'future DECT' indoor only applications in the 1900–1920 MHz frequency range.

This action by ACMA delivers an important positive message to the global eco-system for DECT-based solutions and is one we hope other administrations will follow.

We believe that the ACMA approach will also pave the way to the deployment of DECT 2020 NR.

ACMA also sought comment on "whether it would be appropriate to include CCD in a future update to the LIPD class licence."

¹ <https://service.shure.com/Service/s/article/microflex-wireless-what-is-dect?language=enUS>

² <https://www.dect.org/downloads.aspx>

As ACMA mentioned:

- “By authorising CCD under the LIPD class licence, they would become, by definition, ‘short-range equipment’, and therefore the Short Range Equipment Standard would apply, where it does not currently.”
- “This would mean that to determine whether a CCD meets the requirements of the Short Range Equipment Standard, the testing methods identified in the Short Range Equipment Standard for the device must be used.”

As a result, the testing method for the 1880–1900 MHz band would then be ETSI EN 300 440³ instead of the relevant ETSI standard for DECT technology, which is ETSI EN 301 406⁴. For various reasons, including the fact that DECT ETSI EN 301 406 standards and Short Range Devices EN 300 400 standards are not aligned, **Shure recommends not to include CCD in a future update to the LIPD class licence and keep CCD arrangements in a standalone instrument relying on ETSI 301 406 standards.**

Shure encourages ACMA to continue the work related to the DECT implementation. In the outcomes of the 1880-1920 replanning, **ACMA announced the introduction of ‘future DECT’ indoor only applications in the 1900–1920 MHz frequency range as an apparatus licence. Shure looks forward to contributing to the technical framework and allocation arrangements in Q4 2024⁵.**

Finally, Shure also looks forward to cooperating and contributing to the evolution of the LIPD class license. **This class licence should get updated to reflect ACMA outcomes of the LIPD class license consultation in May 2023⁶ and to include Wireless Multichannel Audio Systems (WMAS).** Shure’s reply to the latest 5 years spectrum plan consultation is highlighting the latest information on WMAS.

Please contact the undersigned if you have any questions.

Respectfully submitted,
Guillaume Mascot
Head of Spectrum & Regulatory Affairs, Asia-Pacific
Shure Incorporated
Email: mascotg@shure.com

³ [ETSI EN 300 440](#) Short Range Devices (SRD); Radio equipment to be used in the 1 GHz to 40 GHz frequency range; harmonised standard for access to radio spectrum.

⁴ ETSI EN 301 406 includes:

- ETSI EN 301 406-1 Digital Enhanced Cordless Telecommunications (DECT); Harmonised Standard for access to radio spectrum; Part 1: DECT, DECT Evolution and DECT ULE (legacy DECT technology).
- ETSI EN 301 406-2 Digital Enhanced Cordless Telecommunications (DECT); Harmonised Standard for access to radio spectrum; Part 2: DECT-2020 NR (future DECT technology).

⁵ <https://www.acma.gov.au/consultations/2021-11/exploring-future-use-19-ghz-band-consultation-402021#outcomes-for-this-consultation>

⁶ <https://www.acma.gov.au/consultations/2022-10/new-arrangements-low-interference-potential-devices-consultation-352022>