

6 September 2024



The Manager, Wireless Broadband  
Spectrum Planning and Engineering Branch  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

Dear Sir,

**RE: ACMA Review of planning arrangements outside of spectrum licensed areas  
Options paper**

The Communications Alliance's Satellite Services Working Group (SSWG) wishes to thank the Australian Communications and Media Authority (ACMA) for the opportunity to provide a submission on the *1800 MHz and 2 GHz bands – Review of planning arrangements outside of spectrum licensed areas Options Paper* (referred to as 'the bands').

**Issues for Comment**

The SSWG provides the following responses to the ACMA's questions in the Options Paper, noting that our comments are limited to the 2 GHz band. Communications Alliance defers to individual members' submissions to address the areas of the Options Paper not covered by this submission.

**Question 1: The ACMA invites comments on the analysis of spectrum utilisation in the bands**

Members of the SSWG plan to operate Australia-wide and, in some cases, global S-band satellite services in Australia in the MSS bands 1980 – 2005 MHz (E-s) and 2170 – 2195 MHz (s-E) adjacent to the bands under consideration in this Options Paper. Their primary interest is the protection of these MSS networks, noting that the MSS requirements have been developed with regard to ITU requirements for the satellite component of IMT-2020 3GPP work on 2 GHz non-terrestrial network and European arrangements for 2 GHz MSS (including complementary ground component (CGC))<sup>1</sup>.

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<sup>1</sup> Refer to the ACMA's discussion paper on *'Technical design features and allocation considerations for the 2 GHz MSS band (1980–2005 and 2170–2195 MHz)'* (Nov 2023) and [CA SSWG's submission](#) to the paper.

**Question 3: The ACMA invites comments on the case for action conclusion and the desirable planning outcomes**

As indicated in Section 3.5 (MSS services) of RALI-MS33, “there are potential out-of-band interference mechanisms to manage.” This includes taking into account the impact of the introduction of 5G and AAS as described in the Options Paper.

The SSWG encourages the ACMA to complete the development of the technical framework procedures, taking into account any changes in the use of the bands to manage potential out-of-band interference to satellite receiver stations and Earth station receiver stations for the introduction of MSS into the band 1980 – 2010 MHz and 2110 – 2170 MHz respectively.

**Question 4: The ACMA invites comments on the identified policy elements and factors, or others that could be considered**

The SSWG recommends that one of the policy elements to meet the desirable planning outcomes should be consideration of the protection of adjacent band MSS satellite receiver stations and Earth station receiver stations as described in the response to Question 3.

The ACMA will be aware that WRC-23 Agenda Items 1.13 and 1.14 are concerned with the 1800 MHz and 2 GHz bands. The SSWG is of the view that allowance for the outcomes of these agenda items should be built into the policy development process.

**Question 5: The ACMA invites comments on the analysis and preliminary views on the policy elements**

Refer to responses to Question 3 and 4.

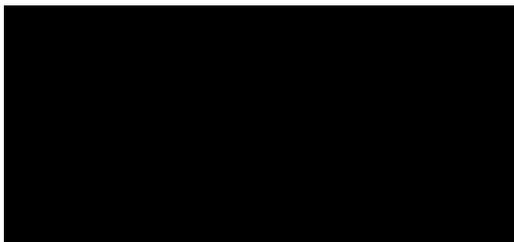
**Question 6: The ACMA invites comments on the analysis and preliminary views on the policy elements**

Refer to responses to Question 3 and 4.

## Conclusion

The SSWG thanks the ACMA for the opportunity to be involved in the consultation process and offers our support as we move forward. If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 02 9959 9125.

Yours sincerely,



**Acting CEO/Director Program Management**

### *About Communications Alliance*

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see <http://www.commsalliance.com.au>.