



30 April 2024

Australian Communications and Media Authority  
Level 32 Melbourne Central Tower  
360 Elizabeth Street  
Melbourne Victoria 3000

To whom it may concern,

The Australian Airports Association (**AAA**) is lodging this submission in response to the Australian Communications and Media Authority (**ACMA**) consultation on its draft Five-Year Spectrum Outlook and annual work program (**Work Program**), issued on 25 March 2024.

Specifically, the AAA urges the ACMA to include a review of the current body scanner licensing arrangements to accommodate the operation of body scanners in the 20-40 GHz frequency range in its 2024-25 Work Program. The AAA made the same request in 2023, along with several other stakeholders. However, the ACMA chose not to consider the issue in the 2023-24 planning cycle.

### **About the AAA**

The AAA is the leading advocate for appropriate national policy relating to airport activities. The AAA represents the interests of more than 340 airports and aerodromes Australia wide, including all Designated, Tier 1 and Tier 2 security-controlled airports where security screening equipment is in use. This is in addition to more than 150 corporate members providing products and services to the aviation industry, including security.

### **Why is this issue important for the aviation sector?**

Body scanners are an integral part of aviation security and are the front-line in detection of traditional and emerging threats. However, high false alarm rates and the limited ability of current technologies to reliably detect smaller metallic and non-metallic threat objects are pain points across the aviation sector.

High false alarm rates on existing body scanner technologies hold up security screening processes and result in longer wait times for passengers.

In addition, the body scanners currently deployed in Australian airports do not necessarily offer the same degree of privacy or gender neutrality to passengers as some newer technologies. The AAA is concerned to reduce the incidences of inefficient, and sometimes stressful, secondary inspections.

Newer technologies have demonstrated superior performance in reducing false alarms whilst maintaining existing detection standards. New technologies also have capacity with higher resolution to evolve with the threat detection landscape providing a platform to manage changes in the security environment.

There are also important benefits for passenger facilitation with an improved passenger experience which is vital to our members to reduce the friction in the book to board process.

Body scanners currently operate in security screening areas at Australian airports pursuant to an ACMA class licence which permits use of the 24.25-30 GHz and 67-80 GHz frequency ranges.

However, the AAA understands that the newer body scanning technology which are in the process of being deployed in other jurisdictions operates in the 20-40 GHz frequency range. While this technology is not accommodated within the current licensing framework, it has a range of benefits including materially lower false alarm rates, improved privacy and significantly improved resolution and detection of threats that would substantially address some key challenges that the aviation industry is currently facing.

The AAA therefore urges the ACMA to consider reviewing the current body scanner class licence as part of its 2024-25 Work Program. Given the anticipated lead time between consideration of the issue in the Work Program and the formalisation of any resulting licensing changes, the AAA views this issue as urgent.

If you have any questions about this submission please contact:

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Yours sincerely,

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**Chief Executive**