



6 May 2024

The Manager Economics Advisory
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

Re: Association of Old Crows Australian Chapter (AOC Australia) Submission to *Draft Five-year Spectrum Outlook 2024-2029* for Consultation

I write on behalf of AOC Australia, the Australian chapter of the international organisation *Association of Old Crows (AOC)*. The AOC is a not-for-profit professional association dedicated to information warfare (IW) disciplines, including electronic warfare, information operations, electromagnetic spectrum operations, cyber electromagnetic activities and space operations. The AOC brings together individuals and organisations involved in these various aspects of IW, from across military, government, industry and academia. The AOC plays a significant role in spectrum management because IW involves the control and manipulation of the electromagnetic spectrum. As technology advances, the spectrum becomes increasingly congested with various wireless communications, radars and other electronic devices. We feel that effective spectrum management is essential to ensure that military and civilian communications operate without interference and remain secure from electronic threats.

AOC Australia therefore represents our members within the Defence and Defence Industry sectors, to express our gratitude for the opportunity to participate in the ongoing dialogue surrounding spectrum management in Australia. We appreciate the chance to contribute to the *Draft Five-year Spectrum Outlook 2024-29* recently published by the Australian Communications and Media Authority (ACMA).

At AOC Australia, we are advocates for the interests and needs of our membership community, fostering collaboration, innovation, and advocacy within the Defence and Defence Industry domains. The 2024 National Defence Strategy and proposed budget outlined in the Integrated Investment Program released last month by the Australian Government, there is a significant allocation of planned investment to bolster Defence electronic warfare and spectrum-related capabilities. This is a crucial step towards fortifying national security and safeguarding our nation's interests. This investment commitment from Government demonstrates the critical importance of the radio



frequency bands outlined in the draft spectrum outlook, particularly those indispensable to Defence and Defence Industry operations. Many of the spectrum bands mentioned in the outlook are the lifeblood of our nation's defence infrastructure, supporting essential functions such as radar, antennae, communications systems, and other vital Defence applications crucial to maintaining our sovereignty and operational effectiveness. In light of the paramount significance of these frequency bands to Defence and Defence Industry stakeholders, we advocate for robust consultation and engagement processes prior to the commencement of spectrum planning initiatives. Collaboration is key to sustaining our operations and upholding Australia's sovereign capability in defence technology and innovation.

It is a responsibility of everyone to preserve and enhance our national security. AOC Australia is of the opinion that informed, inclusive, and forward-thinking spectrum management decisions can do this. By fostering open dialogue and collaboration, we can navigate the evolving spectrum landscape and safeguard Australia's position as a leader in defence technology and capability.

The Defence and Defence Industry community has insightful observations regarding the evolving spectrum demand landscape. The continued emphasis on investing in next-generation wireless networks and sovereign satellite capabilities underscores the critical importance of ensuring connectivity, security, and operational resilience across Defence operations. Likewise, we call for greater efficiency in spectrum utilization and access to additional spectrum where necessary to meet the evolving demands of military-specific applications.

Defence and Defence Industry recognize the significance of emerging technologies including those of modern smaller satellite technologies across the range or orbital planes. In this regard, we support Defence's endorsement of initiatives to review satellite filing procedures and consider band planning for future satellite services, essential steps towards the effective integration of satellite communications into Australia's spectrum ecosystem.

As the use of sovereign technologies increases across the range of Defence applications, we see significant growth in the sovereign Defence industry. It is essential to support Defence with continued access in a range of harmonised bands within allied countries and regions, recognised by the extensive effort the Australian Defence puts into AUKUS, Combined Communications Electronics Board (CCEB) and NATO. Growth in the Australian Defence industry is reliant on the ability to produce capability that can be used



beyond the Australian borders, and within the operational environment that Defence needs to operate.

We recognise several agenda items from the recent WRC23 that have an impact on both Defence capability and Defence industry's ability to develop and deliver the necessary capability for our modernised Defence capability. AOC Australia intends on participating in the implementation of the outcomes from the WRC23 by way of representing its members views through consultation with ACMA.

Further we recognise there are several Agenda Items in the new WRC27 study cycle that impact both Defence and Defence Industry. AOC Australia will participate in the relevant Australian Study Groups, industry consultations and any other workshops to represent its members views.

In conclusion, AOC Australia stands ready to support ACMA, Defence, and the Defence Industry in fostering a resilient, efficient, and inclusive spectrum management framework that meets the needs of all stakeholders. We are committed to constructive engagement and collaboration to safeguard the interests of our members and our nation.

Thank you for affording us the opportunity to contribute to this crucial discussion. We look forward to continued dialogue and collaboration as we navigate the challenges and opportunities presented by the evolving spectrum landscape.

Yours sincerely,

Lauren Hassall

Chief Executive Officer

AOC Australia

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