

April 24, 2024

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority (ACMA)
PO Box 13112 Law Courts
Melbourne VIC 8010

Re: Comments on Draft FYSO 2024–29

Dear ACMA -

Federated Wireless, Inc. (Federated Wireless), the industry leader in the development and deployment of commercial dynamic spectrum management solutions (DSMS), offers these comments in response to ACMA's draft five-year spectrum outlook 2024–29 and 2024–25 work program. Given our experience in implementing dynamic spectrum sharing in the 3.5 GHz and 6 GHz bands in the United States and in the 3.8 GHz band in the United Kingdom,¹ Federated Wireless appreciates the opportunity to offer our perspectives on how ACMA can leverage commercially available DSMS tools and technology to achieve its goals of increasing efficiency, minimizing congestion, and encouraging competition in the provision of wireless broadband services.

Federated Wireless commends ACMA for its decision permit allow to allow low-power RLAN devices in the lower 6 GHz band. We encourage ACMA to move expeditiously to enable Standard Power as well as outdoor operations in conjunction with the use of an AFC. As a certified AFC system operator in the United States, we see significant industry interest in using the 6 GHz band for a wide variety of use cases that require higher power levels and greater operational flexibility than the current LIPD rules allow. We also see widespread interest in the use of AFC systems to ensure incumbents are protected from harmful interference. We, therefore, recommend that ACMA leverage the AFC systems and AFC-managed devices that are

¹ Federated Wireless is a certified Spectrum Access System ("SAS") administrator for the Citizens Broadband Radio Service ("CBRS") band and a certified Automated Frequency Coordination ("AFC") system operator for the 6 GHz band. In addition, as part of the 5G Testbeds and Trials Programme funded by U.K. Department for Digital, Culture, Media & Sport, Federated Wireless developed a software toolkit that enables a prospective applicant for Ofcom's Shared Access Licenses (SAL) to make inquiries in advance of filing an application to identify spectrum availability and to tailor the SAL application to increase the likelihood of acceptance.

commercially available in other countries in order to take advantage of the growing global ecosystem and increase broadband connectivity for Australians.

Federated Wireless is also interested in working with ACMA on its plans for the upper 6 GHz band. We believe ACMA can make spectrum in the upper 6 GHz band available for RLAN operations in the near-term, while preserving flexibility and optionality for the introduction of other technologies, such as IMT, in the future. Our AFC system with its scalable, automated architecture can assist ACMA not only with protecting incumbent 6 GHz operations, but also with managing multiple types of new shared uses. For example, should ACMA permit LIPD services to operate in the upper half of the 6 GHz band under management of an AFC system, ACMA could leverage the AFC system to adjust spectrum availability for LIPD devices were it to license spectrum to IMT users in the future.

Additional optionality could also be achieved using DSMS technology were ACMA to offer spectrum on an opportunistic basis to both traditional license-exempt technologies (e.g., Wi-Fi) and traditional licensed technologies (e.g., IMT) in the upper 6 GHz band. By requiring devices to register and check-in with an AFC to receive channel and transmit power availability, ACMA can preserve optionality for the future while maximizing efficient spectrum usage today.

Federated Wireless looks forward to working with ACMA to introduce higher power LIPD services across the 6 GHz band using our AFC system. We also look forward to exploring how our DSMS technology and tools can be leveraged to introduce even greater flexibility for shared spectrum access in the future.

Respectfully submitted,

/s/ Jennifer M. McCarthy
Jennifer M. McCarthy
Vice President, Legal Advocacy
Federated Wireless, Inc.
2121 Crystal Drive, 7th Floor
Arlington, VA 22202
