

ABN 55 997 240 779

PO Box 352
Northcote
VIC 3070
Tel: 03 9481 7706

**To: Spectrum Management Outlook and Strategy Section
Australian Communications and Media Authority (ACMA)**

Re: Five Year Spectrum Outlook 2021-2026 (FYSO)

Submitted: Electronically

Date: 27th April 2021

The Australian Commercial and Entertainment Technology Association Incorporated (hereinafter referred to as ACETA), ABN 55 997 240 779, welcomes the opportunity to comment on the Draft Five Year Spectrum Outlook 2021-2026 (FYSO) of the Australian Communications and Media Authority (ACMA).

A not-for-profit incorporated industry association; ACETA is the peak body for Australian organizations that create, manufacture or represent manufacturers of commercial entertainment technology, and entertainment technology service providers.

ACETA's primary role is to represent the common interests of, and provide a united voice for, the Industry. The aims of the association will be achieved by addressing and realising the general objective, to provide a forum that deals with the challenges confronting the industry in a transparent, inclusive and cohesive manner, to protect and enhance its well-being.

Wireless Audio devices such as wireless microphones and in-ear monitor systems are utilised daily by an extremely wide variety of end users including schools, churches, conference and exhibition facilities, Theatres, TV production, corporate meeting rooms and tertiary education.

These applications continue to grow annually in scale and density to meet the needs of broadcast and event producers engaged in increasingly complex productions to meet audience expectations.

Most of these systems operate under the current Low Interference Potential Devices Class Licence (LIPD) utilising spectrum in the 520 – 694 MHz range. The continued viability of these systems is reliant on continued availability of sufficient, interference-free spectrum in this range.

ACETA offers comment on the following question from the draft FYSO 2021-26 Document.

1. Do you have any feedback on the ACMA's approach to the five-year spectrum outlook?

We appreciate and endorse the ACMA's approach to the FYSO as it provides visibility and transparency to the ACMA's planning and future works program.

2. Are there other technology developments or sources of spectrum demand that the ACMA should be aware of in considering spectrum management over the next 5 years?

We note that the FYSO does not specifically mention any provision for the future spectrum needs of wireless audio devices, which currently share spectrum with digital television services in the 600 MHz band and operate under the LIPD class licence.

3. Do you have any feedback on the ACMA's plans for monitoring, initial investigation, preliminary replanning, or implementation of bands?

3A. 600 MHz

We note that the ACMA intends to re-plan the use of the 617-698 MHz range within this band in the future, potentially consolidating television services into the lower part of the UHF band. Elsewhere, this has resulted in a critical lack of spectrum for wireless microphones. Given that UHF (470 – 698 MHz) remains the primary global band for wireless microphone operation, we are concerned that ACMA's re-plan for this spectrum will impact existing wireless audio uses and greatly inhibit the ability to adequately meet the continued increase in demand for such devices. We ask the ACMA to take this into account in its plans for the 600 MHz band.

3B. 1880 – 1920 MHz

DECT Based Wireless audio devices in 1880 – 1900 MHz band are regularly used in the Audio Visual (AV) and Entertainment industries for applications such as the production intercom and video conference systems. In addition to these systems a growing number of manufacturers are offering wireless microphone systems that operate in the DECT band in response to the global reduction in available UHF spectrum in the 520 – 694MHz range for wireless microphone systems over recent years. We ask the ACMA to consider the requirements of these devices and services in any re-planning of the DECT allocation. Particularly in relation to any reduction in UHF spectrum (520 – 694 MHz) as this will increase the demand for spectrum in the DECT band as services seek alternative spectrum to support operation of wireless audio devices in high density applications.

4. Do you have any comments about the ACMA's approach to forward allocations?

We support the four stages of forward planning as outlined in the draft FYSO. We request the ACMA strive to provide as much notice as possible to industry and allow adequate time for industry to plan and implement any required changes in an orderly and financially viable manner.

For example, The Australian tertiary education sector is a major user of wireless audio devices with some Universities operating hundreds of channels per campus. This represents a significant investment by the sector, who expect a service life of 10 – 15 years on this investment.

Likewise, broadcast entertainment sectors have invested heavily in Wireless Audio products to meet the demands of modern productions and sporting events which often utilise 50+ channels of wireless audio devices per event.

Most of these devices currently operate in the 600 MHz band which we note is flagged as in the “initial Investigation” stage of planning. Any reallocation of the 600 MHz band would necessitate extensive changes to existing wireless audio hardware imposing a significant financial burden on end users including the University sector who are still suffering from COVID-19 impacts including loss of income, staff redundancies etc.

5. Do you have any other comments on Part 2?

No further comments

6. How do you use the FYSO (for example, read once a year or regularly refer to)?

The annual FYSO is a valuable source of information to us as it informs and gives visibility to the ACMA’s priorities and work plans. In general, we refer to it once each year close to the issue date. We may refer to it depending on the relevance to our industry, products, and services.

7. Do you find the 6-month and annual progress reports useful?

Yes. Per comment to question 4. Forward notice and accurate visibility of project progress and timing is essential for us to plan for an accommodate changes to supply lines, product design, frequency band planning etc.

Respectfully submitted by

Frank Hinton



President ACETA

P: 0414 905 136

E: info@aceta.org.au