Thank you for the opportunity to comment on the discussion paper, “Planning of the 3700-4200 MHz band”. Any plans to introduce wireless broadband (WBB) in the 3700-4200 MHz band must consider the potential impact on the safety critical aeronautical services operating in the adjacent band 4200-4400 MHz.

Aviation is concerned about interference to Wireless Avionics Intra-Communication (WAIC) systems and radio altimeters systems that operate in the aeronautical mobile (route) service (AM(R)S) and aeronautical radionavigation service (ARNS) allocations, respectively, in the frequency band 4200-4400 MHz.

Airservices agrees that initial compatibility studies between radio altimeter and WBB come to different conclusions and support the ACMA efforts to undertake sharing studies in the development of appropriate sharing criteria. Unfortunately radio altimeter has been operating for many years and it is difficult to summarise the technical characteristics for all radio altimeter systems. ICAO has requested that industry provide this information to enable ICAO to develop Standards and Recommended Practices (SARPs) for radio altimeter and WAIC. It is expected that ICAO will have this information available early next year.

The purpose of SARPs is to prevent interference between WAIC systems, radio altimeters and from users of neighbouring bands, in order to ensure the safe operation of aircraft. Of particular concern is that some handsets could operate near the frequency band 4200-4400 MHz, in and near operating aircraft using WAIC systems and radio altimeters.

Mitigations that could be considered include low power devices and base stations and quarantining geographic areas around airports and heliports.

We request that Airservices is included in any discussions and working groups relevant to this reform.

Kind Regards,

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