



Submission in response to
ACMA Consultation paper

**Replanning the 2 GHz
band: Review of the 2 GHz
Television Outside
Broadcast Frequency
Band Plan - consultation
45/2021**

Public Version

February 2022

1. Optus welcomes the opportunity to provide a submission in response to the ACMA's consultation paper *Replanning the 2 GHz band: Review of the 2 GHz Television Outside Broadcast Frequency Band Plan – consultation 45/2021*.
2. The consultation paper invites general feedback on the proposals outlined therein and the accompanying draft variation to the CSO class licence. Optus sets out its feedback to the issues relevant to Optus below and would welcome the opportunity to discuss our feedback with the ACMA.

Background on Use of earth stations and earth receive stations for Space Operation

3. The S-band frequencies are globally allocated for SPACE OPERATION (2025-2110 MHz Earth-to-space & 2200-2290 MHz space-to-Earth) and many satellite operators have used the S-band frequencies for TT&C (Telemetry, Tracking and Control).
4. The increasing demand for commercial and institutional missions in small to medium spacecraft with S-band TT&C has been a catalyst in the development of higher efficiency technologies for space applications such as simplified structures and reduced weights.
5. Under the Australian Radiofrequency Spectrum Plan, the band 2025-2110 MHz and 2200-2290 MHz are allocated on a primary basis to the SPACE OPERATION, EARTH EXPLORATION SATELLITE, FIXED, MOBILE and SPACE RESEARCH.

New Allocation

6. In the proposed 'Draft - Radiocommunications (Television Outside Broadcasting) (2010–2110 MHz and 2200–2300 MHz) Frequency Band Plan 2022', the operation of an earth station in the 2025 MHz to 2110 MHz frequency band & an earth receive station in the 2200 MHz to 2300 MHz frequency band may be a secondary service for the purposes of the spectrum plan and must not be used in the Perth area. Optus is concerned that there has not been any reason provided for this change in the consultation paper and requests further clarification from the ACMA.
7. As a preliminary comment, Optus considers that the above proposal is likely to cause confusion on how best to manage interference between these stations, including new stations, and other services and note that there is no secondary service in these bands under the ARSP 2021. Optus considers that there should be further consultation on the potential impact of operating SPACE OPERATION as a secondary service on affected industries.
8. Optus ultimately encourages the ACMA to ensure the use of earth stations and earth receive stations for SPACE OPERATIONS studied separately to ensure that SPACE OPERATIONS in this band are able to be protected and coordinated.