



28 February 2022

The Manager  
Space Systems  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

## **ABC submission to the ACMA regarding:**

**Review of the 2 GHz Television Outside Broadcast Frequency Band Plan – consultation 45/2021; and**

**Proposed licensing arrangements for 2 GHz narrowband mobile-satellite services and 28 GHz fixed-satellite services – consultation 46/2021**

### **1. Introduction**

The Australian Broadcasting Corporation (the ABC) welcomes the opportunity to respond to the above consultation papers which were released by the Australian Communications Authority (ACMA) in December 2021.

The ABC, along with the commercial television broadcasters, utilises spectrum in the bands 2010 – 2110 and 2200 – 2300 MHz to support Television Outside Broadcast (TVOB) operations Australia wide. These operations are coordinated in accordance with RALI FX21.

TVOB services provide a critical role in the ABC's capacity to capture and produce its content and deliver against the ABC Charter mandated by the *Australian Broadcasting Corporation Act 1983* (Cth). The ABC considers that any change to the utility of this spectrum might pose significant risk to the ongoing reliability of its operations.

### **2. Review of the 2 GHz TVOB Band Plan**

We acknowledge that spectrum currently utilised for TVOB purposes in the ranges 2010–2110 MHz and 2200–2300 MHz in the revised TOB Band Plan will retain the same arrangements and protections as are currently afforded to these services. The ABC has no objection to the proposed changes.

### **3. Proposed licensing arrangements for 2 GHz narrowband mobile-satellite services**

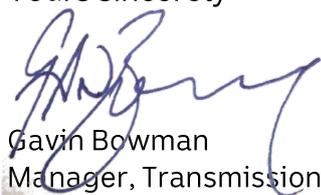
The proposal is in-line with the transition of TVOB services away from the 1980–2010 and 2170–2200 MHz ranges, these services being replaced by mobile-satellite services (MSS). Each of these ranges would comprise a 25 MHz segment for Australia-wide MSS and a 5 MHz segment for shared access, including Australia-wide narrowband MSS, telemetry, short messaging and IoT applications. It is recommended that the 2 x 5 MHz ranges (2005–2010 and 2195–2200 MHz) immediately adjacent to TOB allocations should be utilised by low interference potential services in lieu of a guard band.

There are restrictions proposed for the new services, to support and protect the adjacent TVOB operations.

The ABC shares the concerns of the other TVOB operators, in that the proposed restrictions are based on defined geographic locations and differ between metropolitan and regional areas. The proposed licensing arrangements include restrictions on duty cycle and power levels for metropolitan areas but has suggested that lower limits, i.e. higher power and higher duty cycles may be appropriate in regional areas. The risk is that emissions from these class-licensed, higher power, higher duty cycle services may, over time, encroach on metropolitan areas, increasing the potential impact on TVOB services. Location specific Apparatus Licensing, or a combination of Class and Apparatus Licensing may assist in managing this.

Until appropriate licensing or other means of ensuring the geographic location of services operating with higher power levels and duty cycles is established, the proposed metropolitan restrictions should apply to all areas.

Yours sincerely



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