

9 April 2021

Dominic Byrne

Manager
Infrastructure and Equipment Safeguards Section
Licensing and Infrastructure Safeguards Branch
Australian Communications and Media Authority

Dear Dominic

RE: Consultation on Radiocommunications equipment rules

Communications Alliance welcomes the opportunity to provide comments on the ACMA's Radiocommunications equipment rules consultation.

The draft *Radiocommunications Equipment (General) Rules 2021* is designed to ensure the standards and labelling requirements under the existing Act, remain enforceable. The *Radiocommunications Act 1992* will be amended by the *Radiocommunications Legislation Amendment (Reform and Modernisation) Act 2020* to modernise the legislative framework for spectrum management. On commencement of the Modernisation Act reforms, the power to make standards will be replaced by the power to make equipment rules. Communications Alliance supports the ACMA proposed approach, to effect a seamless transition to the new arrangements.

Communications Alliance notes that the equipment rules provisions have been designed to provide greater flexibility and more options for the ACMA in addressing requirements relating to equipment. Communications Alliance supports the ability of this approach to impose obligations on the most appropriate person in the supply chain, beyond that of the current arrangements where obligations can only be imposed on manufacturers or importers of equipment.

Recognising that the new equipment rules are the first stage of the ACMA's planned implementation, Communications Alliance would welcome the opportunity to be involved when the ACMA takes further steps to streamline and improve the regulation of radiocommunications equipment.

On a separate note, with the introduction of the Radiocommunications equipment rules to facilitate the supply of radiocommunications devices into Australia, Communications Alliance is aware that there have been early considerations to streamline and align arrangements for the supply of telecommunications equipment under the *Telecommunications Act*. Communications Alliance would welcome the opportunity to work with the ACMA at the appropriate time.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on [REDACTED] .

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Stanton', with a long, sweeping underline.

John Stanton
Chief Executive Officer

About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:

<http://www.commsalliance.com.au/>