

12 April 2019

AMTA Submission to ACMA IFC 4/2019:  
Radiocommunications exemption arrangements for  
drone jamming devices  
Consultation paper, March 2019



**Australian Mobile  
Telecommunications  
Association**

The Australian Mobile Telecommunications Association (AMTA) recognises that drone technology is growing in use, and expected to continue to grow and that this means that we need to ensure safe use of the technology and minimise any risks associated with malicious use of the technology.

AMTA strongly supports the necessity of the [Radiocommunications \(Prohibited Device\) \(RNSS Jamming Devices\) Declaration 2014](#) (RNSS Jamming Device Prohibition) and the [Radiocommunications \(Prohibition of PMTS Jamming Devices\) Declaration 2011](#) (PMTS Jamming Device Prohibition) to ensure that communications networks are not unduly interfered with or disrupted. Our telecommunications networks are fundamental to delivering connectivity and ensuring safety of the public through the provision of services including Triple Zero. Undue interference with telecommunications networks and licensed spectrum must be avoided and it is essential that the regulatory framework is sufficiently robust to ensure networks are protected.

While AMTA supports the intention of the proposed exemption to ensure that the AFP has the necessary tools to ensure their ability to respond to malicious threats involving drone technology, we do have some broad concerns with a regulatory approach that continues to introduce exemptions to the prohibition instruments without first carefully considering the broader impact of this.

For example, we now have exemptions in relation to bomb disposal, corrective services facilities (two in place and a third pending) and visits by VIPs. We also note that while this exemption relates to AFP, it is likely that other law enforcement agencies, including the State and Territory police forces, will seek access to the same technology and also require an exemption. This could result in a proliferation of exemptions across jurisdictions.

AMTA urges the ACMA to review the exemptions already in place and those that are being contemplated to ensure a co-ordinated and considered regulatory approach that does not undermine the fundamental policy of prohibition of jamming devices.

More specifically, we also raise concerns that the proposed exemption in relation to drone technology will not deliver the desired outcome. We are aware that drone manufacturers are developing anti-jamming technology.

Further, it seems almost certain that drone technology will be developed to circumvent jamming, including by operating drones in different frequencies, and this will then require either more capable jammers or a different tactic to control drones.

Specifically, AMTA notes that drone jammers are generally capable of GPS jamming even though this is not allowed in the proposed exemption. Jamming GPS can affect 4G and 5G networks which use GPS for synchronisation (eg TDD networks). Further, some drones have hardware that supports other frequencies such as 902 to 926MHz (which overlaps with mobile spectrum) which drones might switch to if they can't use 2.4 and 5.8GHz.

Finally, we urge the ACMA to consider a whole of Government, holistic and co-ordinated approach to the management of all prohibited devices, including jammers, so that a consistent policy can be applied to ensure we avoid a proliferation of exemption instruments as allowing exemptions may not be the most effective way to manage prohibited devices and also have the potential to cause interference and disturbance to communications networks.

AMTA would be happy to discuss how a co-ordinated and holistic approach to the management of prohibited devices could be considered further if that would be helpful.

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