

16 May 2019

The Manager
Strategy and Transition Section
Spectrum Review Implementation Branch
Australian Communications and Media Authority

By email: spectrumworkprogram@acma.gov.au

Dear Sir/Madam

Re: ACMA Five-year spectrum outlook

Thank you for the opportunity to comment on the ACMA's Five-year spectrum outlook. As always, ASTRA appreciates the ACMA's commitment to transparency in relation to its key spectrum planning and management functions.

As ASTRA has noted in the past, ASTRA's members rely on spectrum to provide a diverse range of news, information, sport and entertainment programs which deliver significant social benefits to a broad cross-section of the Australian community. Our members are the leading innovators in Australian television, using new technology and business models to lower production costs and provide consumers with content wherever, whenever and however they choose. One in three Australian households subscribe, along with millions more who watch subscription content in public venues.

ASTRA is largely supportive of the roadmap proposed by the ACMA in this FYSO and we note the focus on work plans for the next 12 months, together with forecasts for subsequent years is of great value to spectrum users.

Primarily, we wish to note our concern regarding the transition of C-Band 3700 MHz to 4200 MHz from monitoring to initial investigation stage for possible 5G use. This move is premature, and should be postponed until the outcomes of the WRC-19 process regarding this spectrum are known. Whilst we support in principle the need to find additional spectrum for 5G, we submit this should only occur on the condition that use by incumbent users is balanced against future use.

As set out in previous submissions, ASTRA's members rely on C-Band spectrum to deliver a broad range of popular and valuable news, sport and entertainment content – 10 linear channels and over 1500 hours of sport and news each year makes its way to Australians via this spectrum (as set out below):

Linear Channels:

Off IS19:

CNN (moves to Asiasat 7 in June)
BBC World
CNBC
Discovery Kids

Discovery TLC
Discovery Science
Discovery Turbo
BBC World Radio
ESPN

Off Asiasat 7:-
CNN (from June)
Bloomberg

Feeds for program contribution:

For Sky News off Asiasat 5:

AP News Direct
AP Asia
Reuters live

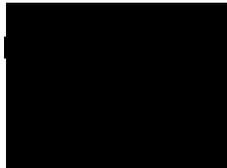
For Fox Sport off Asiasat 5 and IS19:

Golf
Cricket
World Cup Rugby
French Open Tennis
La Liga Soccer (4k)

We also note that the TOB MSS bands 1990 MHz to 2010 MHz and 2170 MHz to 2200 MHz are retained at the initial investigation stage. As noted in ASTRA's previous submissions, these bands should be retained for ENG use pending the outcome from WRC-19.

If you have any queries or would like to discuss the issues raised in this submission, please contact me .

Yours sincerely



Holly Brimble
Policy and Regulatory Manager