



DDA
Digital Distribution Australia

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ACMA CONSULTATION REGARDING FUTURE 3.6GHz SPECTRUM

DDA understands the ACMA action replanning use of 3.6GHz spectrum to enable future deployment of 5G in Australia.

DDA owns and operates 37 of 47 point to point licenses identified by the ACMA which fall into the affected 3.6GHz spectrum operating in channels 1,2,3 that are located in area 2 and 3 of NSW and Victoria. These channels are used to carry broadcast video, telco mobile backhaul, emergency service backhaul with very strict Service Level Agreements (SLAs) as well as other commercial data services.

The above channels are within the DDA core network 21 located within DDA Network NSW coast radio link and are treated as essential to provide carrier grade level service, they also are used for strategic protection path for service delivery in other regions throughout Australia.

DDA operates throughout Regional Australia, mainly NSW, Queensland, Victoria.

The ACMA has suggested a 7 year transition period however DDA being a regional Australia service provider of critical services would request a 10 year transition period, for DDA transition based on enormous cost DDA would face taking into account new repeater sites, replacement of long haul trunk radio system, antenna and waveguide systems, etc.

The transition exercise will be a long one and our network will be thrown into catastrophic risk purely as a consequence of loss of network redundancy during the transition period.

Of concern is that it is important that the ACMA consider reserving and guarantee that the required alternative spectrum licenses will be available so that incumbent license users have access to them at no cost until the transition is completed to ensure that proposed migrating spectrum does not become unavailable when those affected actually commence the migration.

DDA is of the view that there should be no regulatory constraints on the licenses held, it is essential to our business that they are renewed until they are migrated or cancelled.

In relation to sharing, our view is that sharing needs to be included as policy regulated by the policy and overseen by the ACMA, we further support a roundtable framework to address sharing policy.

DDA is a member of Wireless Internet Services of Australia whom have also submitted to the ACMA, aside from the above comments, DDA supports their submission.

DDA will participate in the progress of this consultation project with the ACMA going forward.

DDA Contacts are:

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DDA is pleased to have the opportunity to comment.

Yours sincerely



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