

AMTA submission to the ACMA

Spectrum sharing – Overview and new approaches

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**Australian Mobile
Telecommunications
Association**

Introduction

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to respond to the Australian Communications and Media Authority's Information Paper, *Spectrum Sharing – Overview and new approaches*.

AMTA strongly supports the need for effective spectrum management and recognises that sharing, depending on how it is implemented, can be a useful tool in maximising efficient use of spectrum resources as well as the overall public benefit.

Spectrum sharing, however, must always be balanced against the property rights of licensees, particularly with regard to high-value licences that bestow exclusive access to spectrum. With regard to existing spectrum licences, the rights to exclusively use that spectrum must not be diluted by a regulator subsequently introducing sharing systems that would dynamically allow other users to enter that spectrum. Considering the substantial investments involved, it is paramount that spectrum licensees are able to manage any sharing of their spectrum on their own terms and not those of the ACMA. For future allocations, it is important that exclusive spectrum rights continue to provide the investment certainty required by the industry.

While there are potential opportunities to introduce new ways to enable sharing and compatibility, there is also a risk that incumbent users could face interference to existing services and disruption of business plans if sharing arrangements are not carefully considered and implemented.

In the existing Australian market, secondary market trading, spectrum leasing and licence planning already provide a satisfactory framework for meeting the demand for sharing, including allowing primary licensees to control and determine additional uses within the limits of their licences.

New approaches to spectrum sharing

AMTA believes that it is critical that we maintain a strong regulatory framework to protect the spectrum property rights of all licensees while allowing for flexible sharing arrangements. Without regulatory oversight and sound management, flexible sharing arrangements can have unintended consequences that undermine the property rights of existing licence holders.

While the concept of spectrum sharing is gaining momentum with imminent commercial launches in the USA and Europe, the actual benefits of Dynamic Spectrum Access (DSA) are currently unproven. We support further exploration of DSA in Australia, but only after proper cost/benefit analysis and considering the lessons from experiments with sharing in other administrations.

As most international initiatives in non-traditional spectrum sharing are still in the early stages of development, we suggest that the ACMA should continue to monitor the overseas trials to better understand what will work in practice and will translate well to the Australian environment.

AMTA believes that the introduction of non-traditional sharing techniques across different technologies and industries will require more active management of interference by the ACMA. We therefore believe the new approaches considered in the Paper will require the ACMA to maintain a strong, active and authoritative role in spectrum and interference management. The ACMA will need the ability to manage agreement on coordination techniques, exit criteria, governance and dispute resolution.

Any spectrum sharing framework or methodology will require robust detection, management and enforcement processes to minimise any detrimental impact on primary spectrum licensees and their existing operations and use of spectrum.

AMTA believes that the potential success of any spectrum sharing initiatives will depend on establishing sufficient incentives for both primary and secondary users to make spectrum available in any sharing arrangement.

DSA, for example, poses significant challenges as it requires higher technical capability of devices, integrity of databases and relies on timely data updates. AMTA suggests that DSA is an example of a non-traditional sharing model that will require a carefully managed transition to implementation in Australia, if further analysis proves that it should be considered for our market.

Finally, AMTA submits that the viability of DSA and other non-traditional spectrum sharing models should be monitored as an on-going work item for the ACMA. Where evidence from specific overseas use cases or sharing techniques shows promising potential outcomes for the Australian market, the techniques and use cases can be proposed and assessed on merit at the appropriate time.

For any further questions relating to this submission please contact Lisa Brown, Public Policy Manager, AMTA at lisa.brown@amta.org.au or 02 8920 3555.