

19 November 2019

MYRIOTA PTY LTD

Submission in response to the ACMA's Consultation paper: Update to Foreign Space Objects Determination

Myriota Pty Ltd, was founded to revolutionise the Internet of Things (IoT) by offering disruptively low-cost and long-battery-life global connectivity. Based in Adelaide, Myriota has a growing portfolio of more than 20 patents, and support from major Australian and international investors. With deep heritage in telecommunications research, world-first transmission of IoT data direct to nanosatellite was achieved in 2013. Myriota has made this ground-breaking technology commercially available for partners worldwide. Myriota has recently inked first-of-its kind agreements with both the Australian Space Agency and Optus Business to support its mission to make connectivity accessible to everyone.

Myriota welcomes the opportunity to provide a submission to the ACMA in response to the proposed amendment of the Foreign Space Objects Determination to include the following entities as owners, controllers or operators of foreign space objects:

- Kepler Communications Inc. (incorporated in Canada)
- SpaceX Services, Inc. (incorporated in the United States of America)
- Swarm Technologies, Inc. (incorporated in the United States of America)

Myriota understands that by requesting an update of the Foreign Space Objects Determination, these foreign operators intend to apply for licences with the ACMA to operate in Australia. Myriota currently operates in Australia to provide a direct-to-orbit satellite IoT service, using our existing ACMA licences, and Australian ITU filing. Myriota will require frequency coordination with any foreign operators who intend to operate in Australia using spectrum with frequency overlap of our existing ACMA licences.

Myriota has observed the application¹ of Swarm Technologies to the Federal Communications Commission for market access in the United States, as well as the recent publication of their foreign ITU filing². As further indicated in the ACMA's Consultation Paper³, Swarm Technologies are interested in operating in Australia using VHF spectrum internationally allocated to the

¹ <https://docs.fcc.gov/public/attachments/DA-19-1044A1.pdf>

² USASAT-NGSO-7 as published in CR/C/4998 of IFIC 2901

³ IFC 34/2019 - Consultation paper - Update to Foreign Space Objects Determination

Mobile Satellite Service. Myriota notes our existing Australian licences in the following frequency bands:

- 137-138 MHz (space-to-Earth)
- 148-149.9 MHz (Earth-to-space)
- 149.9-150.05 MHz (Earth-to-space)

It is foreseeable that foreign company Swarm Technologies shall apply for licences with the ACMA for access to these same frequency bands, through the use of their foreign ITU filing. Myriota requests to the ACMA that we are consulted prior to any such licence being granted. Myriota provides essential services and appropriate frequency coordination is necessary between Myriota and Swarm to ensure the successful coexistence between our satellite systems. This may require a review of the conditions of use of the listed frequency bands.

As a key participant in the Australian space industry, Myriota looks forward to working with the ACMA as Australia's use of spectrum continues to evolve. We thank the ACMA for providing an opportunity to aid in transforming and growing a globally respected Australian space industry that lifts the broader economy, and inspires and improves the lives of Australians, underpinned by strong international and national engagement.

Yours sincerely,



David Haley
Chief Technology Officer
Myriota Pty Ltd