Arrangements for jamming devices and radiocommunications device exemptions review

ITS Australia Submission

13 July 2020

ITS Australia sincerely appreciates the opportunity the Australian Communications and Media Authority (ACMA) has provided to make a submission on this issue as it is relevant to a number of our members and the ongoing safety of our tunnel networks. On the issue of the proposal to amend the Radiocommunications (Prohibited Device) (RNSS Jamming Devices) Declaration 2014, ITS Australia support amendments that would facilitate trials of radionavigation-satellite service (RNSS) repeaters to provide Global Positioning System (GPS) coverage in tunnels across the road network.

With more than 1,200 people dying and over 30,000 people being seriously injured each year on Australia's roads, the only long-term goal we can have is for zero fatal and serious injuries. To that end, we believe connected and cooperative Intelligent Transport Systems and automated vehicle technology are one of the key safety initiatives to achieving that ambitious goal. These potentially life-saving technologies though also come with additional challenges to consider.

To that end we are strongly supportive of the ACMA's undertaking to explore new ways of addressing current and future challenges associated with new and changing capabilities of radiocommunications devices and the operation of those devices by a wide range of public, private and commercial users.

Many of the tunnel networks in Australia and those under construction are extremely complex and as such require specialised communications and tunnel positioning technologies such as GPS which provide greater wayfinding services and support emergency services by optimising emergency fleet management and situational awareness inside the tunnels.

We understand the ACMA is aiming to capitalise on the trial deployments under scientific licensing to gather technical data, such as spectrum requirements and number of frequency bands used for the devices. With trials assisting ACMA in identifying any unintended consequences and collect information to inform a long-term licensing solution.

ITS Australia are very supportive of trials but would also suggest that there is a network of industry and international experience in deploying these technologies that could be leveraged by ACMA in expediting the discovery process, for example the FCC in the US has already undertaken a similar approach as that being proposed by ACMA and much could be gained from gathering evidence from those agencies and industry stakeholders in advance.

The safety of our citizens is paramount and intelligent transport systems and related driver assistance technologies are clearly saving lives on our roads now. Emerging and future technologies through connected and cooperative systems will provide enhanced in-vehicle and network safety and efficiency. However, there are domain specific applications that will require a specialised approach and consideration.

Industry is keen to work with government to best deliver these life-saving technologies, and ITS Australia is well placed to facilitate these discussions. ITS Australia commends the Federal Government and the ACMA in continuing the important work of better understanding Australia's communications challenges and engaging with industry and the community in the development of this strategy.

ITS Australia support trials of radionavigation-satellite service (RNSS) repeaters to provide Global Positioning System (GPS) coverage in tunnels across the road network and would support ACMA in any industry engagement required to facilitate these activities. To facilitate the design and deployment of the most effective trials a clearer understanding of the technical and operational conditions under which ACMA intend to allocate licences would be appreciated.

While the ACMA Scientific Licencing approach would be the fastest way to facilitate the currently proposed RNSS repeater/simulator trials in road tunnels the time and cost associated with acquiring the licence for each tunnel would delay deployment in the long term, It would be beneficial for ACMA to establish a permanent licencing regime to ensure government and industry confidence in planning infrastructure and technology investments.

Additionally, under the technical and operational conditions of the scientific licence the licensees will bear all the risk of trials, to support operators in exploring viable technologies and preparing for trials it would be beneficial if ACMA publishes the technical guidelines, operational conditions, licence terms and associated fee structures enabling state governments and private road operators to make informed investment decisions.

ITS Australia would appreciate the opportunity to continue engaging with ACMA and industry both nationally and internationally on the development of the regulatory frameworks for these devices including the technical and operational guidelines under which they will operate.

Yours sincerely,

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ITS Australia

ITS Australia is the peak group representing over 120 public and private organisations delivering on transport solutions and technology improving Australia's road and transport networks and promotes the development and deployment of advanced technologies to deliver safer, more efficient and sustainable transport across all public and private modes – air, sea, road and rail.

Established in 1992, ITS Australia is an independent not-for-profit incorporated membership organisation representing ITS suppliers, government authorities, academia and transport businesses and users. Affiliated with peak ITS organisations around the world, ITS Australia is a major contributor to the development of the industry.

As set out in the Strategic Plan 2018-2021 our vision is to shape future transport to be safe, efficient and environmentally sustainable through the implementation of Intelligent Transport Systems. Our mission is to:

- Advocate for, and inform discussion about, ITS;
- Facilitate collaboration and partnering amongst industry, government and researchers;
- Support research, development and the deployment of ITS technologies;
- Influence and guide the successful development of the ITS industry.