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13 JULY 2020

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne Vic 8010

Ref: Facilitating trials of radionavigation-satellite service (RNSS) repeater devices in road tunnel networks- Consultation paper

Dear Sir/Madam,

Thankyou for the opportunity to make a brief submission in response to your consultation paper.

Vicom Australia Pty Limited, is a long established supplier of test, measurement, monitoring and communications infrastructure products and services to Australia New Zealand and the SW Pacific .

In this capacity we have been working with several Government Depts, Public Safety Authorities and Tunnel Operators to bring about a trial of this exciting technology for providing improved positional information in GPS denied environments and have an interest in several trails which depend upon the changes presaged in the consultation paper.

Needless to say we are in favour of the changes you suggest and are particularly pleased to see that you have included within your definition of repeaters certain types of repeater systems (commonly known as simulators) that re-broadcast an adjusted signal that incorporates the receiver's location with a spatial correction.

We would like to raise several items that you may wish to consider as you roll out these changes:-

- The potential for future applications beyond road tunnels eg rail infrastructure, mines, should not be excluded
- Creating an environment where organisations that invest in the trials are, if successful, able to be certain of a long term ability to operate the equipment beyond the 12 months scientific license
- Focussing the technical specifications on the boundary conditions where there is the possibility of creating interference with open sky GPS signals
- Moving the process forward as fast as possible consistent with good spectrum management principles both to take advantage of the unique opportunities in the immediate tunnel construction pipeline and to bring the benefits to our emergency services personnel as quickly as possible.

In addition to the points above we have taken the liberty of including a short presentation that runs over the principles of the system. Whilst likely redundant for your personnel it may assist in explaining the concept to others.

Should you have any questions please feel free to contact myself or Chris Jones the GM in charge of this program.

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Thank for your consideration of this submission

Yours sincerely

Roger Kane
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