AUSTRALASIAN RAILWAY ASSOCIATION

Association Number A03958 | ABN 64 217 302 489

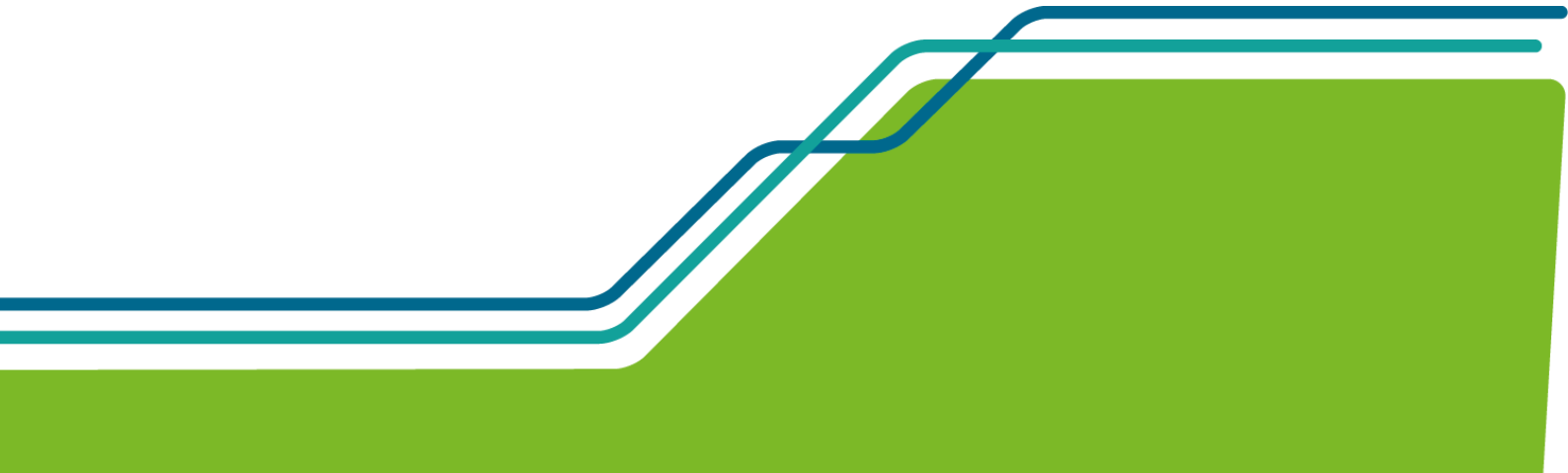
AUSTRALASIAN RAILWAY ASSOCIATION SUBMISSION

To

The Australian Communications and Media Authority

On

Arrangements for jamming devices and radiocommunications device exemptions - consultation 15/2020



The ARA

The Australasian Railway Association (**ARA**) is a not-for-profit member-based association that represents the Rail industry throughout Australia and New Zealand. Our members include rail operators, track owners and managers, manufacturers, construction companies, and other firms contributing to the rail sector. We contribute to the development of industry and government policies in an effort to ensure passenger and freight transport systems are well represented and will continue to provide improved services for a growing population.

The ARA thanks the Australian Communications and Media Authority (**ACMA**) for the opportunity to provide feedback to the *Arrangements for jamming devices and radiocommunications device exemptions*.

For further information regarding this submission, please contact Maria Morozova, Program Manager at ARA via mmorozova@ara.net.au or 0499 919 496.

Summary

The Australasian rail industry utilises GPS for various purposes including provision of location information to augment Train Control Systems, processes and procedures, automatic selection of train control communications channels and control areas. The lack of GPS within rail tunnels, underground networks, built over stations and rail maintenance sheds would benefit from amendments to the Radiocommunications (Prohibited Device) (RNSS Jamming Devices) Declaration 2014 allowing the use of devices such as radionavigation-satellite service (RNSS) repeaters.

The ARA also welcomes the ACMA's proposal to amend the RNSS Jamming Device Prohibition to facilitate use of RNSS repeaters.

Issues for comment

1. What changes in technology, and developments in the communications and broader environment, are likely to put pressure on the prohibition and exemption framework?

Examples of new technologies available to repeat RNSS within rail tunnels include:

https://syntony-gnss.com/

https://syntony-gnss.com/products/subwave/

https://www.vicom.com.au/page/291/vicom-intelligent-gps-repeater-system-for-tunnels

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There are and have been a number of new rail tunnel projects around Australia in order to meet the demands of population growth. This trend will likely continue.

For example, the ARTC Advanced Train Management System (**ATMS**) project was recently announced by Deputy Prime Minister, The Hon Michael McCormack as "the priority train control project" for the nine major rail freight businesses in Australia. Similarly, ATMS has been chosen as the train control system for the Federally significant Inland Rail project which requires the construction of three tunnels of up to 6.38km in length. The ability to service GPS signals in tunnels will be important to the success and safety of ATMS in the Inland Rail project.

2. In what ways is the prohibition regime not performing optimally?

Presently there is uncertainty regarding the use of devices such as RNSS repeaters in rail tunnels.

3. Are there devices currently not prohibited that should be?

No comment.

4. Are there devices currently prohibited that should not be?

RNSS repeaters for use in locations where they do not pose a risk of interference to above ground RNSS systems.

5. What additional measures could the ACMA take to provide transparency and predictability in relation to exemption determinations?

No comment.

6. How could the ACMA consider facilitating use of meritorious, low risk, and outlier devices and applications in lieu of exemption determinations?

No comment.

7. Is the range of activities that may be exempted from Parts of the Act fit for purpose?

No comment.

8. Is the range of persons to whom the exemption regime may apply fit for purpose?

No comment.

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