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AMSA: D20/247018

Proposed update to the Australian Radiofrequency Spectrum Plan

To whom it may concern

The Australian Maritime Safety Authority (AMSA) thanks the Australian Communications and Media Authority (ACMA) for this opportunity to comment on *Proposed update to the Australian Radiofrequency Spectrum Plan - consultation 27/2020*.

The outcomes of World Radiocommunication Conference 2019 (WRC-19) will affect search and rescue (SAR) and maritime communication in the future, in particular, agenda item 1.8 and 1.9.2 to modernise Global Maritime Distress and Safety System (GMDSS) and introduce the satellite component of the VHF data exchange system (VDES).

Based on the decisions of WRC-19, consistent with Australia's position taken to the Conference, AMSA supports including the outcomes of agenda items 1.8 and 1.9.2 of WRC-19 in the Spectrum Plan:

- identification of the frequency band 495 – 505 kHz for use by the international NAVDAT system
- identification of a new primary allocation to the maritime mobile-satellite service in the band 1 621.35 – 1 626.50 MHz
- identification of a new secondary allocation to the maritime mobile-satellite service in the frequency bands 157.1875–157.3375 MHz and 161.7875–161.9375 MHz for non-GSO satellite systems to enable a new VDES.

Two agenda items, 1.9.1 and 1.10, did not result in changes to the Radio Regulations.

Agenda item 1.9.1 sought to categorise and identify whether additional frequencies were required for autonomous marine radio devices (AMRD). Group A (safety of navigation) will be permitted to use the automatic identification system (AIS) and digital selective calling (DSC) technology on the AIS and DSC frequencies in the VHF band. Group B (non-safety of navigation) have been allocated an experimental channel (VHF channel 2006).

These changes are unlikely to solve the issues present in AIS through the proliferation of non-safety equipment. Users will need new equipment to operate on VHF channel 2006, as that frequency is not backward compatible with existing AIS equipment. AMSA, as the competent authority for AIS, will continue to explore opportunities to improve the AIS system and its function to contribute to safety of navigation.

Agenda item 1.10 on regulatory arrangements to support the Global Aeronautical Distress and Safety System (GADSS) resulted in no changes to the Radio Regulations as no new or updated technologies or regulation (from the International Civil Aviation Organization (ICAO) in particular) were identified. There are non-spectrum activities that will continue under GADSS through ICAO, but it is not anticipated that this will result in a future requirement for additional spectrum.

AMSA also supports changes proposed to Australian footnote AUS53. As noted in the consultation paper, the proposed structural changes are to implement updates to the Spectrum Plan because of changes over time to Appendix **17** of the Radio Regulations.

AMSA makes no comments on other aspects identified in the consultation paper or draft Spectrum Plan.

The point of contact within AMSA for any further enquiries is Stuart Shepard, Senior Advisor, Maritime Communications, on +61 2 6279 5703 or stuart.shepard@amsa.gov.au.

Yours sincerely



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