



Mercedes-Benz

ACMA - Australian Communications and Media Authority  
PO Box 13112  
Law Courts  
Melbourne VIC 8010  
Australia

Your reference number, your message from

Our reference number, our message from

andrea\_marie.scholl@daimler.com

Date  
2020/09/28

**In response to: Public Consultation – Update to the Australian Radiofrequency Spectrum Plan, Issued August 26<sup>th</sup>, 2020**

Dear Sir or Madam,

We are very grateful for the public consultation document “Proposed update to the Australian Radiofrequency Spectrum Plan” that you have published online and for giving us the opportunity to comment.

With respect to the 24GHz ISM (24.05-24.25GHz) band, we would kindly like to ask you to reinstate it for automotive radars. Moreover, we would kindly like to ask you to add a foot-note in the 24GHz UWB (24.25-26.65GHz) band that reads “Use of 24.25GHz-26.65GHz (UWB) band for Automotive radars is only valid for existing systems initially radio-type approved before January 1<sup>st</sup>, 2018”.

In accordance with the European legislation 2011/485/EU, we would kindly like to import vehicles that are equipped with 24GHz ISM and UWB radar sensors until December 31<sup>st</sup>, 2021.

Furthermore, to support the continuous supply of spare parts for our customers in Australia, we kindly ask you to allow the import, sale, installation and operation of these radars after December 31<sup>st</sup>, 2021 to enable our customers in Australia to continuously operate their existing automotive radar systems to the end their vehicle's life. This is due to the fact that it is technically impossible to replace defective or damaged 24GHz radars with automotive radars operating in the 76-81GHz range.

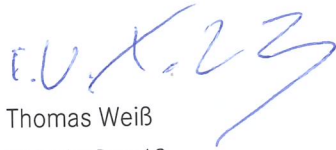
Mercedes-Benz AG | 70372 Stuttgart | T +49 711 17 0 | F +49 711 17 22 24 4 | [www.mercedes-benz.com](http://www.mercedes-benz.com)

Mercedes-Benz AG | Headquarters and Registry Court: Stuttgart, HRB No. HRB762873 | Chairman of the Supervisory Board: Manfred Bischoff  
Board of Management: Ola Källenius (Chairperson), Jörg Burzer, Renata Jungo Brüngger, Sajjad Khan, Sabine Kohleisen, Frank Lindenberg,  
Markus Schäfer, Britta Seeger



and Mercedes-Benz are registered trademarks of Daimler AG, Stuttgart, Germany.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'T. Weiß' with a stylized flourish at the end.

Thomas Weiß

Mercedes-Benz AG

Certification and Regulatory Affairs –  
Alternative Drives and Active Safety

A handwritten signature in blue ink, appearing to read 'R. Kofler' with a stylized flourish at the end.

Dr. Ralph Kofler

Mercedes-Benz AG

Certification and Regulatory Affairs –  
Homologation Korea and Rest of World