



Submission in response to
ACMA Consultation Paper

**Exploring Radio Local
Area Networks (RLAN)
use in the 5 GHz and
6 GHz bands**

Public Version

May 2021

OPTUS FEEDBACK

1. Optus welcomes the opportunity to respond to the Australian Communications and Media Authority (ACMA) consultation paper on *Exploring Radio Local Area Networks (RLAN) use in the 5 GHz and 6 GHz bands*.
2. The Consultation Paper sets out proposals to amend the Radiocommunications (Low Interference Potential Devices) Class Licence 2015 to:
 - (a) Enable the lower 500 MHz (5925-6425 MHz) of the 6 GHz band be made available for RLAN use; and
 - (b) Consideration to updating the Australian regulatory arrangements in the 5 GHz band to reflect international regulatory arrangements in the 5150-5250 MHz range that were agreed to at WRC-19.
3. RLAN use in Australia is primarily authorised via the LIPD Class Licence. Optus' preliminary views on these issues are set out below.

6 GHz band (5925-7125 MHz)

4. Optus broadly supports the investigation of the 6 GHz band for RLAN. In particular, we support the release of the lower 500 MHz for unlicensed use such as Wi-Fi, in line with the ACMA's proposals that:
 - (a) The bottom 500 MHz (5925-6425 MHz) be made available for use in Australia under the LIPD Class Licence; and
 - (b) That these devices be allowed to operate at two different power limits:
 - (i) 24 dBm (11 dBm/MHz) if only used indoors (i.e. 'Low Power Indoor' devices)
 - (ii) 14 dBm (1 dBm/MHz) in all locations (i.e. 'Very Low Power' devices)
5. Importantly, Optus does not support the introduction of any dynamic spectrum sharing or DSA-like arrangements in this band. In general we support appropriate proven methods of spectrum sharing but not unproven dynamic spectrum sharing and that the costs of implementing and operating dynamic spectrum should be fairly apportioned according to the benefit each party receives.
6. Optus also support the ACMA in considering the upper 700 MHz for allocation to IMT, with a review to be considered following the outcomes of WRC-23. We also anticipate that future demand may require spectrum licensed arrangements to be introduced in this part of the band. This demand will be driven by the ongoing exponential growth in customer data consumption and demand for ever-faster speeds and higher quality delivery of telecommunication services.
7. It would be premature to foreclose future consideration of the upper part of the 6 GHz band (for other uses such as IMT) at this early stage given the importance of mid-band frequency ranges and the growing demand for data driven consumption.

5 GHz band

8. Optus is in favour of maintaining the existing class licensed arrangements in the 5 GHz band.