



JETTECH NETWORKS
ABN. 90 604 027 241
Level 1 39A Tasma Street
North Hobart
Tasmania 7000
Australian Licenced Carrier No. 352
Phone: 1300 601 146
Fax: 03 8640 0470
Web: www.jettech.com.au

27th November 2017

Attention: The Manager, Spectrum Planning Section

Spectrum Planning and Engineering Branch
Communications Infrastructure Division
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Dear Sir,

Submission Topic: Submission to ACMA on “Draft spectrum reallocation recommendation for the 3.6 GHz band Metropolitan and regional areas of Australia October 2017 ”

This is a submission from Jettech to the third round of submissions following Notice under section 153G dated the 26th of October 2017 re Proposed Re-Allocation of the 3.6 GHz Frequency Band. The submission consists of background information regarding our business and industry sector along with specific submission requests.

Background

Information on Jettech Networks and its fixed wireless point to multipoint services affected by the ACMA proposal.

Jettech Networks (Jettech) are a Hobart-based business employing 10 staff. A major component of our business is in providing network access to a number of customers here in Tasmania which as you may be aware is recognized as being at the lower end of the socio-economic scale.

Jettech are heavily reliant on apparatus licensed 3.6 GHz spectrum to reach our customers in the most effective manner.

Over the last 10 years Jettech has built a solid business providing business grade connections to customers that could not access broadband at all or customers that have requirement for a high availability fixed services. 3.6 GHz point to multipoint allows us to offer carrier grade services to customers at an affordable price point.

Jettech’s network investment in staff, core routing infrastructure, microwave backhaul and facilities was undertaken to provide 3.6 GHz point to multipoint access to approximately 80% of our customers.

Jettech does not see this service being viable without equitable spectrum access for smaller players in the market.

Since the commencement of the 3.6 GHz consultation process and the subsequent embargo, Jettech has been forced to halt expansion plans. This ultimately impacts on the livelihood of our staff and our ability to provide high quality services to customers in Tasmania.

Apparatus licensed point to point is not scalable or cost effective for mid-bandwidth customers due to the high cost and requirement to install dedicated equipment at a tower site for each customer. Speeds typically achievable using 3.6 GHz technology are 10/10 Mbps, 25/5 Mbps, 50/20 Mbps and in some cases on older 30 MHz allocations we can achieve close to 100 Mbps. Reliable services can't be delivered over ISM class licensed equipment. The Australian Communications and Media Authority (ACMA) proposal of replacing 125 MHz of 3.6 GHz spectrum with a very small 40 MHz allocation of 5.6 GHz spectrum for incumbent 3.6 GHz point to multipoint users is a grossly inadequate measure. There are also other concerns regarding the viability of the proposed 5.6 GHz allocation.

Our opinion is ACMA's highest value use determination for 3.6 GHz does not take into account the socio-economic benefits that small fixed wireless service providers add to the community in rural and regional Australia.

ACMA's options 3b and above as discussed in the ACMA 3.6 GHz discussion paper June 2017 would have a devastating effect on a large number of established 3.6 GHz fixed wireless point to multipoint service providers. Option 3a is sensible approach as it generates a high return for the spectrum in high demand areas and does not displace a large number of incumbent users.

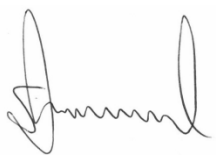
Jettech's business model, like many other fixed wireless service providers requires access to equitable spectrum to continue to operate and provide good outcomes for regional Australia.

Specific Submission Points

1. Jettech Networks are alarmed at the impending re-allocation of the 3.6 GHz Band. Jettech feel that the considerations of our industry sector have not been adequately addressed by the "consultation" process. We note the recent comments from ACCC Chairman Rod Simms "the value of spectrum lies in the economic and social benefits it can provide to citizens and consumers, not in financial returns to the Budget" and we also consider this has not been fully taken into consideration. We consider the socio-economic benefits provided by the incumbent Fixed Wireless Network Service Providers reliant on 3.6 GHz apparatus licensed spectrum have not been given adequate weighting and we urge ACMA to reconsider its approach, particularly for the low socio-economic Tasmania sector in which we operate.
2. Jettech urges ACMA to provide alternative viable spectrum for incumbent Fixed Wireless Network Service Providers so our industry can continue to operate.
3. Jettech urges ACMA to provide financial assistance to transition to a viable spectrum solution. As outlined by many respondents to round 2 submissions, the proposed 5.6 GHz arrangement is grossly inadequate to continue delivering services transitioned from 3.6 GHz.

4. Unless solutions around points 2 and 3 above are offered, the decision will directly impact Jettech's business model as a Fixed Wireless Network Service Provider to such an extent the business will have to cease operations, given our business relies on operating Fixed Wireless Point to Multipoint services to reach customers. We request this is given adequate weighting.
5. Jettech have already suffered financial loss due to the embargoes halting any further network expansion starting when this reframing process started in October 2016. We request this is given consideration and some certainty provided to our sector.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sam Jeanneret', with a stylized, cursive script.

Sam Jeanneret,
Managing Director