

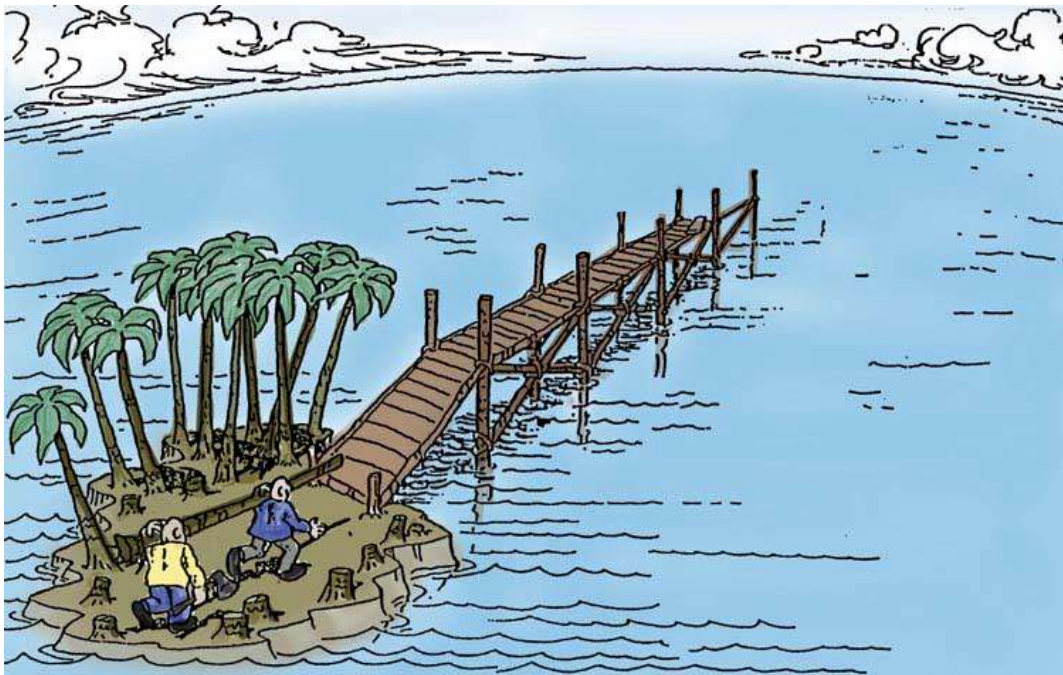
## Shoalhaven Internet

27 November 2017

Comments on the ACMA Notice dated 25 October 2017

Notice under section 153G of the Radiocommunications Act 1992

PROPOSED RE-ALLOCATION OF THE 3.6 GHz FREQUENCY BAND



**Have all the Alternates been considered ? -Boeing Trade Study Process.**

SpectrumLicensingPolicy@acma.gov.au  
The Manager  
Spectrum  
Licensing Policy Section  
Spectrum Management Policy Branch  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

Thank you for the opportunity to comment on your proposed determination.

The decision making process is normally transparent to allow some confidence in the outcome:

*In order to meet customer quality requirements, each Trade Study conducted within Product Definition is expected to be characterized by a consistent set of elements which include*

*. . .*

- Clear problem statement
- Identification of requirements that must be achieved
- Ground rules and assumptions
- Decision criteria
- Resource requirements statement (source/man hrs reqd)
- Schedule to accomplish (proposed and actual)
- Potential solutions and screening matrix
- Comprehensive array of feasible alternatives
- Comparisons of alternatives using decision criteria
- Technical recommendation of trade study leader
- Documentation of decisions leading to recommendation.

Shoalhaven Internet is concerned that these elements are missing from the ACMA studies.

Shoalhaven Internet, as a carrier of 20 years standing in Regional Australia, joins with the Wireless Internet Service Provider association of Australia to condemn the actions of the ACMA to dispose of this spectrum in a fire sale.

We believe that this action will damage regional industries and small businesses and strip opportunity from Regional Australia for the next decade. The 700Mhz, 2.1Ghz, 2.3Ghz 2.5Ghz auctions provide historical verification of this failed policy.

We respectfully request that the ACMA cease this regulatory action, return to the table and conduct trade studies identifying security, economic, social and political criteria. We ask that the ACMA seriously revisit the industry sharing options that have been proposed. The world is moving to DSLM, and given spectrum is a finite resource it is desirable for Australia to adopt similar strategies.

We are keen to constructively engage with the ACMA to help prevent this unintended damage to regional Australian businesses.

Yours sincerely

Michael Parnell  
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