June 6, 2019

**VIA ONLINE SUBMISSION**

The Manager, Spectrum Planning Section

Spectrum Planning and Engineering Branch

Communications Infrastructure Division

PO Box 78, Belconnen, ACT 2616

**RE: Draft spectrum reallocation recommendation for the 26 GHz band in cities and regional centres**

Facebook is pleased to submit these comments in response to the Australian Communications and Media Authority’s (ACMA’s) consultation on its draft spectrum reallocation recommendation for the 26 GHz band.[[1]](#footnote-1) Facebook commends the ACMA for moving forward to make the 24.25-27.5 GHz (“26 GHz”) band available to support the rollout of 5G wireless broadband in Australia.

Facebook’s mission is to give people the power to build community and bring the world closer together. And connecting people is a critical first step in executing this mission. Today, nearly half of the world’s population is still not connected to the Internet.[[2]](#footnote-2) Among those that have connectivity, many are under-connected. Connecting these people is a complicated effort that requires not just bringing network infrastructure to more people, but establishing a regulatory environment that fosters innovation and encourages investment.

To do its part, Facebook, working with a range of partners, has launched several initiatives focused on connecting the unconnected and under-connected. It will take a mix of technical solutions to bring connectivity to all. As such, Facebook has been investing in research and development efforts in a range of technologies, including mobile, satellite, and aerial such as high altitude platform stations (“HAPS”).

Improving connectivity in Australia and around the world means pursuing spectrum policies that maximize the utilization of this limited resource and promote the expansion of both the capacity and coverage of wireless networks. To this end, as the ACMA works to make the 26 GHz band available to support wireless broadband, we encourage the ACMA to license the 26 GHz band in a manner that both encourages investment and maintains flexibility to allow for a variety of technologies and deployments to utilize the spectrum.

As noted in its initial comments,[[3]](#footnote-3) Facebook supports a licensing model that would allow for a range of deployments, including mobile, fixed wireless, or smaller scale deployments. The proposed licensing framework, which establishes a combination of licensed spectrum, apparatus licensing, and class licensing should do so.[[4]](#footnote-4) By using a combination of license types, instead of a traditional wide-area exclusively licensed framework, the ACMA will be in a position to optimize and accommodate a wider range of use cases.

Business models, services and use cases for 5G broadband in this band are still being developed. Under the proposed licensing framework, the ACMA will maintain flexibility to support optimal partioning of spectrum between different types of deployments. Although a likely use case for this spectrum is mobile operator deployments in metropolitan areas, there could be other potential future use cases that may not yet be known. For example, as Facebook has noted before, HAPS, which are well-suited to providing backhaul services to enable broadband and also facilitating critical emergency communications links during natural disasters, could play a role in supporting 5G services in the band.[[5]](#footnote-5) Going forward, Facebook agrees that the ACMA should continue to “monitor demand and developments” regarding potentially expanding class licensing in the band.[[6]](#footnote-6)

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As the ACMA proceeds with its plans to make the 26 GHz band available for wireless broadband deployment, Facebook encourages the ACMA to consider licensing options that would encourage investment and deployment of wide area mobile networks yet allow for long-term flexible use across platforms within the band.

Respectfully submitted by:

/s/ Christopher Weasler

**Facebook, Inc.**

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1. “Draft spectrum reallocation recommendation for the 26 GHz band” May 2019 *available at* <https://www.acma.gov.au/theACMA/draft-spectrum-reallocation-recommendation-for-the-26-ghz-band> (“Draft Spectrum Reallocation Recommendation”). [↑](#footnote-ref-1)
2. International Telecommunication Union, Measuring the Information Society Report 2018- Volume 1 at 2 (11 Dec. 2018) *at* <https://www.itu.int/en/ITU-D/Statistics/Documents/publications/misr2018/MISR-2018-Vol-1-E.pdf>. [↑](#footnote-ref-2)
3. Submission of Facebook, Inc. November 9, 2018, Options for wireless broadband in the 26 GHz band, available at <https://www.acma.gov.au/theACMA/options-for-wireless-broadband-in-the-26-ghz-band> [↑](#footnote-ref-3)
4. Draft Spectrum Reallocation Recommendation at 4. [↑](#footnote-ref-4)
5. The International Telecommunication Union is studying HAPS identifications in millimeter wave spectrum bands including the 26 GHz band in Region 2. Resolution 160 resolves that the ITU-R will study the existing HAPS identification of 27.9-28.2 GHz (paired with 31.0-31.3 GHz) as appropriate 38-39.5 GHz. In addition, in Region 2, the ITU-R will study 21.4-22 GHz and 24.25-27.5 GHz. *See id. See* Resolution 160 (WRC-15\_ available at <https://www.itu.int/dms_pub/itu-r/oth/0c/0a/R0C0A00000C0015PDFE.pdf> [↑](#footnote-ref-5)
6. Future use of the 26 GHz band: Planning decisions and preliminary views at 13, April 2019 <https://www.acma.gov.au/theACMA/options-for-wireless-broadband-in-the-26-ghz-band>. [↑](#footnote-ref-6)