

Radio local area networks (RLANs) in the 6 GHz band - consultation 37/2021

Proposed updates to the LIPD Class Licence for 6 GHz RLANs

December 2021 | ITS Australia Submission



ITS Australia Submission

ITS Australia welcomes the opportunity to comment on the ACMA's RLAN use in the 6 GHz band consultation and strongly support ACMA's continuing regulatory arrangements to promote the introduction of C-ITS in the 5.9 GHz band (5.855-5.925 GHz) in Australia and maintaining the Class License under section 132 of the Radiocommunications Act 1992, for C-ITS transceivers in vehicles, roadside infrastructure and carried by people.

With more than 1,200 people dying and over 30,000 people being seriously injured each year on Australia's roads, our critical long-term goal is for zero fatal and serious injuries. To that end, we believe connected and cooperative Intelligent Transport Systems and Advanced Driver Assistance Systems are some of the key safety initiatives to achieving that ambitious goal. These potentially life-saving technologies though also come with additional challenges to consider.

Our transportation networks are national critical infrastructure and in an increasingly connected world will be heavily reliant on the communications spectrum as our vehicles and infrastructure become more sophisticated and interconnected. As the peak body representing industry in the transport and technology sector, we strongly support the important role the Authority plays in ensuring the vital resource of spectrum is managed effectively and responsibly.

Previous projections indicated more than 11.2 million light vehicles equipped with some form of Vehicle-to-Everything (V2X) system will be produced globally in 2024, representing 12 percent of new light vehicle fleet sales. The estimated production of light vehicles equipped with V2X systems was just under 15,000 units in 2019, and this will grow at a compound annual growth rate (CAGR) of 277.5 percent in 2024. In Europe alone VW have sold over 500,000 Golf vehicles which are CITS equipped. While these projections may be impacted by COVID 19 there are still potentially significant safety and congestion benefits from these vehicles, as well as the cooperative vehicles.

Advance driver assistance systems (ADAS) and emerging CITS applications are a major factor in changing the automobile from a collection of analogue control systems to a fully networked and connected digital car.

With the determination made by the ACMA to put in place the Radiocommunications (Intelligent Transport Systems) Class Licence 2017 and its safety critical use, it is imperative that this 5.9GHz band be protected from potential interference from RLAN devices. Transmissions from RLAN devices should be carefully considered and tested to confirm that there is no compromise to the efficaciousness of road safety applications.

This spectrum allocation is a key pathway to improve current safety levels and ensure the future safety of our transport networks. The industries' continued unimpeded access to this spectrum band is key to realising future safety benefits. Alignment with the European standards, including harmonising vehicles regulations, is a key consideration and equally supported by industry.

Within the Australian environment numerous projects have been undertaken to demonstrate and trial these technologies, these activities are instrumental in ensuring that the technology can and will be adapted to the Australian Environment such as the following projects:

- <https://www.qld.gov.au/transport/projects/cavi/cavi-project>
- <https://www.qld.gov.au/transport/projects/cavi/cooperative-and-highly-automated-driving-pilot>
- <https://www.qld.gov.au/transport/projects/cavi/ipswich-connected-vehicle-pilot>
- <http://www.aimes.com.au/>
- <https://roadsafety.transport.nsw.gov.au/research/roadsafetytechnology/cits/citi/index.html>

The above list offers an introduction to some of the important work facilitating the introduction of C-ITS across Australia. As peak body that represents national and international organisations, we strongly support an approach that works towards harmonisation and cross-jurisdictional considerations. We welcome the opportunity to be involved in these ongoing discussions.

Conclusion

ITS Australia commends the Federal Government and the ACMA in continuing the important work of better understanding the regulatory impact of these technologies and we appreciate the consultation programs being undertaken.

The safety of our citizens is paramount and driver assistance technologies are clearly saving lives on our roads now. Emerging and future technologies will in our view provide enhanced in-vehicle safety, however the deployment of these technologies needs government consideration and oversight. Industry is keen to work with government to best deliver these life-saving technologies, and ITS Australia is well placed to facilitate these discussions. Emerging and future technologies through connected and cooperative systems will provide enhanced in-vehicle and network safety and efficiency

There are potential interference issues between systems that may require more detailed investigation and technical expertise that the ACMA may benefit from industry engagement to better understand potential implications going forward.

In closing, we'd like to reiterate the importance of the 5.9GHz spectrum allocation to realising future safety improvements and would be pleased to provide any additional information that might assist the ACMA determination on this and any related matters. To facilitate any future engagement ITS Australia Policy Manager Stacey Ryan can be contacted at Stacey.ryan@its-australia.com.au.

Yours sincerely,



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