



December 3, 2021

**Shure's comments to ACMA's consultation on "Radio local area networks (RLANs) in the 6 GHz band"**

Dear ACMA Executives and Staff,

Shure Incorporated applauds the work of the ACMA and welcomes the opportunity to provide its response to the above-mentioned ACMA's public consultation.

For more than 95 years, Shure has been a leading manufacturer of high-quality, innovative audio products. Shure's products ([www.shure.com](http://www.shure.com)) are utilized worldwide in applications known as audio Programme Making and Special Events (PMSE)<sup>1</sup>, which includes deployments in industries such as broadcast and film production and other professional indoor and outdoor media content creation, in addition to a variety of other civic, business, and special event contexts. These applications continue to grow in scale and density to meet the needs of broadcast and event producers engaged in increasingly complex productions to meet audience expectations.

Audio is of prime importance in the world of PMSE. Without the "audio" part of an event, CEOs, politicians, and entertainers cannot communicate with impact to their audience. Shure is a leading advocate for the PMSE industry in the spectrum arena, actively participating in spectrum consultations around the world.

Given that the extensive growth of Wi-Fi needs more spectrum, we support the opening of the whole frequency range from 5925 MHz to 7125 MHz ("6 GHz") by ACMA for RLAN use. While the use of the upper 6 GHz for IMT is under study for WRC-23, we note that no regulator has issued rules for IMT use of that band. While certain entities are asking to wait for WRC-23 decision before deciding on the use of the upper 6 GHz band, we are of the view that ACMA should open that band as soon as possible on an unlicensed basis so that its citizens can benefit from the 6 GHz Wi-Fi ecosystem enjoyed by the USA, Canada, Brazil and South Korea.

In addition, technology neutral rules would also allow development of ecosystems in 6 GHz which are not based on Wi-Fi, like 3GPP NR-U or ETSI PMSE Wireless Multi-Channel Audio System (WMAS)<sup>2</sup>.

Furthermore, to make more efficient use of the spectrum, enable new use cases and benefit from the unlicensed ecosystem emerging from the USA, ACMA could consider the USA's regulations for high power class-licensed devices as follows in addition to LIPD Class Licence:<sup>3</sup>

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<sup>1</sup> ITU's inclusive term consisting of radio microphones, in-ear monitors, wireless cameras, talkback systems, etc

<sup>2</sup> See [https://www.etsi.org/deliver/etsi\\_en/300400\\_300499/30042201/02.01.02\\_60/en\\_30042201v020102p.pdf](https://www.etsi.org/deliver/etsi_en/300400_300499/30042201/02.01.02_60/en_30042201v020102p.pdf)

<sup>3</sup> <https://docs.fcc.gov/public/attachments/FCC-20-51A1.pdf>

- higher power indoor and outdoor operations controlled by an Automated Frequency Coordination (AFC)<sup>4</sup> system that would prevent interference to any incumbent fixed systems with:
  - Access Points Power up to 36 dBm EIRP (EIRP PSD of 23 dBm/MHz).
  - Client Devices power up to 30 dBm EIRP (EIRP PSD of 17 dBm/MHz).

The USA's regulations could also be considered to protect any incumbent Fixed Satellite Service uplink operation:

- Higher power access points and fixed client devices located outdoors must limit their maximum e.i.r.p. at any elevation angle above 30 degrees as measured from the horizon to 21 dBm (125 mW) to protect fixed satellite services.

Please contact the undersigned if you have any questions.

Respectfully submitted,  
*/s/ Prakash Moorut*

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<sup>4</sup> See <https://docs.fcc.gov/public/attachments/FCC-21-100A1.pdf>