

25 February 2022

The Manager
Space Systems Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

By email: satellite.coordination@acma.gov.au

Dear Sir/Madam

ASTRA welcomes the opportunity to comment on the:

- *Replanning the 2 GHz band: Review of the 2 GHz Television Outside Broadcast Frequency Band Plan - consultation 45/2021*; and
- *Proposed licensing arrangements for 2 GHz narrowband mobile-satellite services and 28 GHz fixed-satellite services - consultation 46/2021*.

ASTRA use of the TOB Band

ASTRA members rely on access to spectrum suitable for electronic news gathering (**ENG**), electronic field production (**EFP**) and television outside broadcast operations (**TOB**) uses. Current use of the Television Outside Broadcast (1980–2110 MHz and 2170–2300 MHz) Frequency Band Plan 2012 (the **TOB Band**) for these uses by ASTRA members includes:

- Fox Sports Australia extensively uses the TOB Band – either directly as a licensed TOB user (at 2284 MHz) or through footage supplied by third parties using the TOB Band;
- Some Foxtel productions use the TOB Band via third party wireless camera operators; and
- Australian News Channel (Sky News) also hires band links within the TOB Band from third parties for programs broadcast from regional towns (e.g. Paul Murray Our Town), major state visits and news events.

ASTRA TOB spectrum principles

As a general principle ASTRA supports spectrum planning which maximises the overall benefit that can be derived from spectrum allocation. However, per previous submissions relating to the replanning of the TOB Band, ASTRA emphasises that adequate, secure and direct access for STV to spectrum suitable for ENG, EFP and TOB is essential to ensure sufficient growth capacity for future coverage of news, sporting and other major events broadcast by STV.

We also maintain that the 2GHz to 3GHz frequency range is the most appropriate range in which ENG and TOB purposes should be licensed, ensuring maximum production value of these broadcasts. This range is also recognised internationally as the most appropriate for ENG and TOB uses.

Implementation concerns in the 1980–2010 MHz and 2170–2200 MHz frequencies

When implementing the replanning of the TOB Band for mobile-satellite services (**MSS**) in the 1980–2010 MHz and 2170–2200 MHz frequencies we ask that incumbent licensed users including Fox Sports Australia, retain access to adequate spectrum suitable for TOB, ENG and EFP uses, with relevant interference protection accorded.

We appreciate that the proposed changes to the TOB Band do not directly impact ASTRA members' licensed use of the TOB Band. However as noted above, ASTRA members rely on third parties for certain TOB activities, and those parties may be impacted by the replanning of the TOB Band. As such we ask that the commencement of the transition of impacted TOB users from the TOB Band to the 7.2 GHz band is delayed until arrangements within the 7.2 GHz band are consulted on and finalised, so that these users retain certainty of access to appropriate spectrum until the transition occurs.

Further, a transition from the 2 GHz band to the 7.2 GHz band will result in considerable cost, including a complete replacement of existing equipment. Therefore, our view is that further certainty in relation to access to TOB appropriate spectrum should be provided before a transition period commences.

Given the critical use of the TOB Band by the STV industry, ASTRA requests that we are consulted on the technical implementation of any new licenses being replanned in the TOB Band to ensure there are no unintended interference issues, and any further consultation by the ACMA on the future allocation of spectrum for TOB uses.

If you have any queries or would like to discuss the issues raised in this submission, please contact me (Lynette.Ireland@foxtel.com.au).

Yours sincerely

Lynette Ireland
On behalf of ASTRA