



**DB TELECOMMUNICATIONS PTY. LTD.**  
ACN 069 768 529

TELECOMMUNICATIONS &  
IT CONSULTING SERVICES  
P O Box 216, Essendon, Vic 3040  
30 Elder Parade, Essendon, Vic 3040  
Telephone (03) 9331 3170  
Fax (03) 9331 3153

9 March, 2022

The Manager,  
Spectrum Planning Section  
Australian Communications and Media Authority  
PO Box 78  
BELCONNEN ACT 2616

**Comments on IFC 04/2022**

**Improving the technical arrangements for AWLs in the 26 GHz and 28 GHz bands**

DB Telecommunications Pty Ltd is pleased to be able to offer some comments on the proposed updates to the various documents covered by IFC 04/2022.

DB Telecommunications did not have any issues with the proposed changes to technical information in the following documents:

- Draft update of RALI MS46
- Draft update of RALI MS 44
- Draft update of Embargo 49

However, DB Telecommunications still has some concerns about the general readability of RALI MS46. It is a very complex document to read and understand.

In particular, DB Telecommunications found the use of terms such as co-primary and sole primary frequency area slightly confusing and it often took several re-reads to of the relevant parts of the document in order to gain a clear understanding of the meaning. The inclusion of Section 1.3.1 Definitions only improved the understanding marginally.

DB Telecommunications would like the ACMA to consider whether there is a simpler way of spelling out the required information with the use of the slightly ambiguous terms.

If you would like additional information or wish to discuss any aspect of my submission, please do not hesitate to contact me on (03) 9331 3170 or by email [dbritt@dbtelecomm.com.au](mailto:dbritt@dbtelecomm.com.au).

Yours sincerely,

David Britt  
Director