

Thursday, 26 May 2022

The Manager  
Major Spectrum Allocations Section  
Australian Communications and Media Authority PO Box 78  
Belconnen ACT 2616  
Email: [SpectrumAllocations@acma.gov.au](mailto:SpectrumAllocations@acma.gov.au)

Dear Madam/Sir,

**Reallocation Declaration for 3.4Ghz and 3.7Ghz bands – IFC 10/2022**

Perth Airport Pty Ltd (Perth Airport) appreciates the opportunity to comment on the proposed spectrum reallocation declaration for 3.4Ghz to 3.7Ghz bands ('band reallocation') undertaken by the Australian Communications and Media Authority (ACMA).

I am writing to you today to express Perth Airport's view on ACMA's proposed declaration to re-allocate radio frequency spectrum in the 3.4 GHz and 3.7 GHz bands (the Proposal).

The Proposal will have a potentially significant effect on the safe operation of aircraft at Perth Airport.

Perth Airport endorses the submissions made to this consultation by other major airports, such as Brisbane, Melbourne and Sydney airports, similar to Perth Airport, they are international gateway airports which will be most affected by the proposal due to sensitivities from international airlines.

Perth Airport is Australia's Western Hub providing the people of Western Australia with a critical link to the rest of Australia and the world. Perth Airport provides economic, social and cultural benefits for Western Australian's by connecting people, business and communities.

Prior to the pandemic, Perth Airport facilitated travel for over 14.3 million passengers to more than 50 destinations across the globe. Maintaining this key gateway for WA is also critically important for Australia's resource sector with Perth Airport facilitating Fly-in / Fly-out operations for over 3 million workers each year. The airport also injects over \$3.5b to the West Australian economy each year. Any restrictions placed on the airport as a result of 5G signal interference could significantly curtail Perth Airport's ability to play its role in supporting the people of WA.

Perth Airport would like to re-iterate and shares the concerns also highlighted by the Australian Airport's Association below:

1. Firstly, it is important for ACMA to acknowledge the feedback provided to its Technical Liaison Group (TLG) in January 2022 from the Radio Altimeter Coordination Group (RA-CG) on the potential safety implications of the Proposal's reallocation of spectrum. The RA-CG includes representation from the Civil Aviation Safety Authority (CASA), airports and peak bodies for pilots and specialist aviation users such as police and emergency services.

2. Secondly, ACMA should improve its Proposal by working with CASA through the RA-CG and ACMA's TLG to find appropriate mitigations to potential 5G interference on safety critical systems onboard aircraft and at airports. ACMA can apply a best practice approach to mitigation by drawing upon the local and international technical experience available through the RA-CG's member organisations and CASA.
3. Thirdly, ACMA should ensure mitigations are in place so the 5G spectrum does not interfere with safety-critical aviation functions in regional and remote Australia, particularly round airports, aerodromes and airstrips where aircraft regularly operate at low altitudes in a range of aeromedical, firefighting and public transport functions.
4. Perth Airport also endorses the interim mitigations identified by Sydney and Brisbane airports in their submissions. These mitigations have the potential to limit any potential negative impacts on aviation brought about by the proposed re-allocation of the 5G spectrum, which include:
  - Establishing an exclusion and /or restricted operating area in and around airports. Canada and France have adopted such areas;
  - Reducing transmitter power in in the vicinity of airports or in the vicinity of airport flight path approaches. France has adopted this measure;
  - Angling 5G tower antennas tilted downward to reduce potential interference with aircraft equipment. France has also adopted this measure; and
  - Fitting more modern radio altimeters to existing aircraft.

ACMA previously identified some of these mitigation measures in the consultation papers issued as part of its Proposal.

Perth Airport urges ACMA to consider implementing such mitigations, even on an interim basis, until more precise information on the interactions of 5G signals on safety critical aviation systems in Australia and internationally becomes available.

Furthermore, Perth Airport's concerns over the band reallocation and their impact on aviation, has been presented to the Executive Officers of the State Emergency Management Committee (SEMC), Perth Airport Aerodrome Emergency Committee (AEC), and the WA Police Force who are the Hazard Management Agency for the preparation and response to any imminent or actual threat to aviation in Western Australia.

The SEMC Executive Officer has noted the summary and advised that the concern for the impact on aviation to be tracked through the AEC. The WA Police Force also noted the concerns. The Aerodrome Emergency Committee at its meeting on the 12<sup>th</sup> of April 2022, considered the overseas experiences and accepted that the information available to date, if accurate, would likely pose a threat to safe aviation and supports expert consideration and appropriate mitigation.

Perth Airport agrees with the AAA and believes it is important for there to be a whole-of-government approach to addressing the vitally important issues raised above. Given that both ACMA and CASA are statutory authorities under the umbrella of the Department of Infrastructure, Transport, Communications and Regional Development (the Department), it is vital that both organisations work together with the Department to achieve the right outcome for both the rollout of a new telecommunications technology and maintaining Australia's globally respected record on aviation safety.

Should you require further information please contact me via [jaxon.thomas@perthairport.com.au](mailto:jaxon.thomas@perthairport.com.au) or (08) 9478 8807.

Yours sincerely



Jaxon Thomas  
**Senior Airfield & Airspace Planner**