



Australian Government

Department of Defence

Chief Information Officer Group

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ALLOCATION OF AWLS IN THE 3.4-4.0 GHZ BAND IN REMOTE AUSTRALIA

References

- A. Consultation paper: Apparatus licences in the 3.4-4.0 GHz band in remote Australia
- B. Draft RALI MS 47 – Frequency coordination and licensing procedures for Area-Wide Licences (AWL) in the 3400-4000 MHz band

1. Defence appreciates the opportunity to comment on the consultation paper in Reference A. Defence also notes that there will be opportunities to further engage with the ACMA on the issues listed in Reference B.
2. Defence welcomes that the ACMA's decisions are guided by one of the objectives of the *Radiocommunications Act 1992*, which derives the long-term public interest by facilitating the use of the spectrum for defence purposes, national security and other non-commercial purposes.
3. The Australian Government will invest approximately \$270 billion in Defence capability over the decade of 2020-30¹. One of the key priorities of these investments will be developing high-capacity information and communication networks relying on long-term certainty of spectrum access. Defence would like to use this opportunity to confirm our long-term interest in accessing the 3.4 - 4.0 GHz spectrum in remote areas.
4. Defence has been represented on the Radio Altimeter Coordination Group (RA-CG). As a part of this group, Defence staff has participated in preparing the feedback to the ACMA's Technical Liaison Group, which raised the concerns not only on the protection around major airport facilities but in general any aircraft's low altitude operation including the protection for landing facilities.
5. Defence acknowledges the challenges in addressing mitigation measures to protect aircraft's low altitude operations and landing facilities as these might occur anywhere across Australian territories considering the potential need for such operations including emergencies. Defence would therefore support technical and administrative measures to mitigate potential interference from Wireless Broadband (WBB) to radio-altimeter installed on any aircraft operating with Australian territories. Defence would support Approach B on

¹ [2020 Defence Strategic Update & 2020 Force Structure Plan](#)

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the issue of AWL coexistence with radio altimeter (Ref A).

6. Defence, in principal, supports the introduction of the maximum allocation quantum policy that would be used as a guidance when considering the maximum spectrum that may be used by a licensee under an AWL within any HCIS level 0 cell. Based on the current predictions of spectrum requirements, Defence expects that a smaller quantum of spectrum, 100 MHz, would accommodate most Defence applications. Defence would however like to point out that there might be circumstances when larger quantum of spectrum would be required considering our diverse needs.

7. My point of contact is Dr Snezana Krusevac on (02) 5130 1169 or via email snezana.krusevac@defence.gov.au.

Yours sincerely

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