

Wireless Internet Service Provider Association  
of Australia Inc

**Response to : Apparatus licences in the 3.4–4.0  
GHz band in remote Australia**



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

28th March 2022

Thank you for the opportunity to provide a response to the Proposed Changes to the Apparatus licences in the 3.4–4.0 GHz band in remote Australia Consultation Paper, the Association represents a wide variety of carriers in Metropolitan and Regional areas, typically smaller operators who have limited access to spectrum.

**Summary**

Regards,  
Dainen Keogh  
Wireless Internet Service Provider Association of Australia Inc  
[secretary@wispau.org](mailto:secretary@wispau.org)

# Issues for comment

We welcome comment from interested stakeholders on any aspect of the consultation package. In addition, we invite comments on these specific questions:

## Technical framework

1. Do you have any comments, and supporting additional information, on the proposed technical framework, including the revised AWL LCD, draft RALI MS 47, and updated RALI FX3 and FX19?

No

2. Do you have any comments on the other issues referred to in the technical framework that have not been resolved in the TLG, such as WBB coexistence with radio altimeters?

No

## Allocation process

3. Do you have any comments on our proposal to use a multi-stage administrative allocation for apparatus licences in the 3.4–4.0 GHz band in remote Australia? Please provide any additional information in support of your views.

No

4. Do you have any views on the appropriateness of an allocation quantum policy? If an allocation quantum policy is adopted, do you have any views on whether that quantum should be 100 MHz or 150 MHz or some other quantum per single HCIS level 0 cell?

We support the allocation quantum policy approach. We believe that quantum should be 100 MHz, or lower, to support both more users and flexibility around spectrum needs for different intended use cases.

## Tenure and renewal

5. Do you have any comments on our licence tenure and renewal policy for AWLs in the 3.4–4.0 GHz band in remote areas?

We support maximum license tenures no shorter than 5 years, and flexibility afforded by shorter tenures.

### **Pricing**

6. We are proposing \$/MHz/pop tax arrangements for AWLs in this band, similar to AWLs in the 26/28 GHz band, and similar to other area-based licences such as PMTS B apparatus licences, because we believe it to be a simple pricing arrangement well-suited to area-based licences no matter the size of the licence or where it is located. Do you have any other pricing alternatives, or suggestions that may improve upon our proposal?

We support an approach similar to the 26/28GHz AWL tax structure.