

Updates to earth coordination requirements - consultation 26/2022

Prepared by

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We welcome the opportunity to respond to the Australian Communications and Media Authority's consultation IFC 26/2022.

In general we support the proposed changes to RALI MS43 and RALI MS45 but we do however have one suggestion we would like to make in relation to one aspect of RALI MS43.

RALI MS 43 Section 2.1.3 (Coordination Procedure)

This section makes reference to a particular version of the ITU propagation algorithm P.452 rather than referencing it generally and providing a link to the ITU website as has been done in the corresponding RALI MS45 document. We would suggest changing MS43 in line with MS45 because we think this is a much better approach:

- It allows the accredited person the flexibility to use the P.452 version that they have available in their software suite whilst also allowing for any future updates that may be of benefit.
- It helps future-proof RALI MS43 as updates to P.452 do not need to be explicitly reflected in the document.

Whilst this may appear to be a relatively minor suggested change to the document we nevertheless consider it to be very important in this case. P452 is a particularly large and very complex algorithm that requires significant time and resources to implement and test and so the very latest version is not always readily available. Requiring an instant change to the algorithm with each update of the RALI is unnecessarily burdensome and unlikely to be of any significant benefit.