

Lacuna Space Feedback on FYSO 2022-27

2022-04-26, M. von der Ohe

We would like to thank the ACMA for the transparency that is provided by the regular release of a FYSO. This approach is inclusive, transparent and outcome-oriented, which helps (satellite) operators in our planning.

Lacuna Space is mainly interested in the integration of satellite-IoT systems in the existing framework. From the FYSO, it seems like all necessary steps are currently undertaken to support IoT systems in various frequency bands, which we endorse.

We want to encourage ACMA to continue their support of satellite-IoT systems in bands that have so far been mainly used by low-power devices. It should be made sure that opening these bands is only done for systems that aim to extend existing LIPD use, i.e. by allowing LIPD devices to operate in remote locations. In order to not harmfully interfere with existing use of the band, the constraints on RF parameters (output power, bandwidth, ...) should not be lifted. It should also be investigated how satellite-to-LIPD transmissions can be integrated in LIPD bands, while limiting the impact to terrestrial devices.

An update to the Radiocommunications (Australian/ Foreign Space Objects) Determination 2014 or to the Radiocommunications (Communication with Space Object) Class Licence 2015 would be welcomed to not only allow space objects communications with objects in the authorized frequency bands listed under 6a and 6b of the class licence.

Last, we strongly support the commitment of operators to coordinate among each other's, particularly in non-interference, non-protection band.