

ACMA 1900 MHz: consultation Issues for comment

Introductory text

We thank ACMA for the opportunity to comment on the Discussion paper “Exploring the future use of the 1880 – 1920 MHz band” and respectfully submit the following answers for consideration

BOSCH Responses to the questions provided in the consultation document

We welcome comments – general or specific – from interested stakeholders on any of the issues raised in this paper. Questions appear in relevant sections throughout the paper and are summarised here. We specifically invite comments on:

1. What is the relevance of the Personal Handy-phone System (PHS) and should this use be retained?

No comment

2. What is the interest in the use of new technologies to provide a service?
 - a) How much spectrum is required to provide the service?
 - b) What interservice considerations need to be undertaken for the service to be deployed?

Prior to deploying new technologies and new services into a frequency band, appropriate sharing and compatibility studies need to be carried out to ensure the protection of the already existing services in the frequency band in question

- c) What are the deployment scenarios for the service?

No comment

3. Are services still using DECT or are they transitioning to DECT-2020 NR?

DECT technology is and will be still in use for all applications. This means that DECT based products are continuing to be used and continue to be offered for sale. DECT-2020NR is not targeted to replace DECT applications. DECT-2020 NR will be an extension, providing new capabilities.

DECT and DECT-2020 NR is already in use and planned to be used in the following fields such as Smart Cities, Industrial IoT (Industry 4.0), Pro-Audio / PMSE and Broadcast market. Additional fields of applications like e-health, smart-home ...

DECT use should be continued to be supported. When allowing the use of DECT -2020 NR, coexistence with existing DECT systems need to be ensured.

4. Are there any applicable coexistence scenarios not identified?

All applicable coexistence scenarios were identified.

Are there any scenarios that are unlikely to be practically achievable (and hence the associated planning scenario should be discounted),

For the proposed coexistence scenarios, it is generally to be noted that such approaches are only feasible, if a technical coexistence between the spectrum users can be achieved. Imposing Sharing methods to allow the spectrum use under the coexistence scenarios considered would put unduly constraints on DECT and DECT-2020 NR devices to get access to the spectrum.

or are there any that are readily achieved?

The coexistence scenario based on the current regulatory framework in Australia, as shown in Figure 2 on page 8, provides a good framework for the operation of DECT and DECT-2020NR applications.

The current regulatory framework for DECT in Australia is the same as in Europe. This provides harmonised conditions for DECT based equipment in these markets.

The regulatory situation for Europe is as follows:

- ***The frequency range 1880-1900MHz is allocated to the FIXED and MOBILE Service***
 - ***the Frequency band 1880-1900 MHz is designated for DECT by ERC/DEC/(94)03 and***
 - ***the framework for license except use of DECT equipment in Europe is based on ERC/DEC/(98)22***
5. What are possible planning scenarios and industry views on the overall future use of the 1.9 GHz band and its services:
- When considering planning scenarios that could be implemented, an approach that is harmonized with other areas of the world eg EU should be preferred. The method outlined in coexistence scenario 2 should then be applied. From a DECT perspective, coexistence scenarios 3, 4 and 5 are not practically feasible***
- a) How much spectrum is required (distinguishing between the minimum viable and desirable) to provide the service?
- DECT applications are already heavily used and they are already occupying the full 1880-1900MHz band. DECT Applications are for example, but not limited to call centers, event team communication. The use of DECT based applications will increase in future. Deployment and use of DECT-2020 NR based applications will put additional constraints on the available spectrum. Expanding the band to 1920 MHz will bring relief to the situation in future. We therefore propose to make available the complete band 1880 MHz to 1920 MHz to DECT and DECT-2020 NR.***
- b) Is there a clear geographical delineation – for example, metropolitan or regional – for the service?
- No, for DECT and DECT-2020 NR use there is no clear geographical delineation.***
- c) Is there or will there be equipment readily available for the service?
- DECT systems are deployed in the market and will continue to be available and in operation. For DECT-2020 applications the industry is working on developing systems that will be available in the near future.***