

JEITA Proposals on the Notification of the draft Radiocommunications (Low Interference Potential Devices) Class Licence Variation 2022 (No.2)

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To whom it may concern

We, the Japan Electronics and Information Technology Industries Association (JEITA), are the leading Japanese association that consists of more than 390 manufacturers, suppliers and service providers for the electronics and information technology sector.

Regarding the invitation of comments to the draft Radiocommunications (Low Interference Potential Devices) Class Licence Variation 2022 (No.2), we would like to submit the following two comments on the proposed amendments to the 5.2 GHz/6 GHz Wireless LAN in Australia.

1. Addition or Replacement of Limits on 5150 - 5250 MHz Band

Concern : Requirement of transmission power may be stricter than current ones for portable devices that can not comply with elevation angle requirements.

We agree with your proposal to relax the transmission power of 1 W by replacing the "Table-transmitters No. 61 in LIPD class licence 2015".

However, sentences of "The power spectral density ~" seems to require not density but transmission power because the unit of limit is mW EIRP. And portable devices cannot comply with the additional requirement of elevation angle of 30 degrees. If transmission power is limited to 125 mW in any direction, there is a concern that it will be stricter than the current limit of 200 mW for portable devices.

Proposal : It should be modified to apply the same limit as the current limit of 200 mW for portable devices that cannot comply with elevation angle requirements by replacing it with following :

61	Radio Local Area Network transmitters	5150–5250	1 W (averaged over the entire transmission burst)	<i>The power</i> of the transmitter must not exceed <i>200 mW (23 dBm)</i> EIRP, in any direction, above 5 degrees of elevation.
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2. Limits of Emissions for Devices Operating in the 5925 MHz - 6425 MHz Band

Concern : The scope of application is unclear in the currently proposed wording and the limits are stricter than the ones that seem necessary.

It is specified in the proposal that the following two restriction statements as emission limits below 5925 MHz are added :

- "Emissions below 5925 MHz must be no greater than -27 dBm EIRP." in table item 63AA (d).
- "Emissions below 5925 MHz must be no greater than -37 dBm EIRP." in table item 63AB (c) and 57A (d).

We understand that these limits were required for out-of-band emissions when they were discussed previously. However, proposed sentence just says "Emissions" then it could be considered that "emissions" should be applied not only for out-of-band emissions but also for spurious emissions. In the table items 63AB and 57A, we are concerned that application of -37 dBm for spurious emissions is stricter requirement than the one that seems necessary. Besides, we understand that -27 dBm EIRP (at below 5925 MHz) for table item 63AA was determined based on the USA regulations, but this limit is stricter than the European out-of-band limit of -22 dBm EIRP (at below 5935 MHz).

Proposal : The sentence should be modified as emissions limit for out-of-band and instead of -27 dBm, -22 dBm EIRP at below 5925 MHz should be applied for the devices in the scope of table items 63AA as follows :

- "Emissions **in out-of-band** below 5925 MHz must be no greater than **-22 dBm** EIRP." in table item 63AA (d).
- "Emissions **in out-of-band** below 5925 MHz must be no greater than -37 dBm EIRP." in table item 63AB (c) and 57A (d).

We are looking forward to having your kind consideration and a favourable response to our above proposal.

With kind regards,
Yours sincerely,

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