

Apple Inc. (Apple) Feedback to ACMA consultation on “Variation to the Low Interference Potential Device Class Licence”

Executive Summary

Apple Inc. (Apple) appreciates the opportunity to submit this filing in response to the Australian Communications and Media Authority (ACMA) “Variation to the Low Interference Potential Device Class Licence”.

Apple supports ACMA allows 5925~6425MHz Narrow Band FHSS applications with higher PSD limits into the Variation to LIPD Class Licence, which are in line with current regulations in Europe/CEPT and UK.

Feedback to Proposed Variations

Frequency hopping radiocommunications transmitters in the 5925–6425 MHz band

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Another information is BTSig recently approved a New Work Proposal—“Enable Bluetooth Low Energy (LE) operation over unlicensed, higher radio frequency bands such as 5 GHz and/or 6 GHz”, which addresses new use cases associated with capturing or rendering high-quality audio on earbuds and headphones (as well as other audio equipment) with significantly lower degradation in quality compared to operation in the congested 2.4 GHz band.

The work proposal also addresses the growing needs of the social and gaming industry for a reliable, low-latency wireless experience on audio devices and mobile game controllers.

Specifically, the work proposal addresses the need to allow concurrent operation of multiple use cases—which requires both low latency and high quality of service—in terms of reserved bandwidth. Other such state-of-the-art Bluetooth use cases that would benefit from operation in higher bands are described in the NWP for High Data Throughput; Gaming Audio; Ultra Low Latency HID Enhancement; Advanced Headset Services; and Channel Surround.

We hope this information can further reflect the trends of NB FHSS applications in 5/6GHz from industry.

In the mean time, even if it is out of scope, Apple supports access to the full 6 GHz band (5925-7125 MHz) for Wireless Access Systems / Radio Local Area Networks (WAS/RLANs) under a licence-exempt regulatory regime for Low Power Outdoor (LPI), Very Low Power (VLP) portable indoor and outdoor, Standard Power outdoor with Automated Frequency Coordination (AFC) with appropriate regulatory conditions.

Apple would welcome the opportunity to address any ACMA queries with this submission.