



AUSTRALIA

Submission by Free TV Australia

ACMA consultation paper:

- **Variation to the Low
Interference Potential
Device Class Licence**

December 2022

Introduction

Free TV Australia appreciates the opportunity to respond to the Australian Communications and Media Authority (ACMA) consultation on:

- Variation to the Low Interference Potential Device Class Licence

Free TV Australia is the peak industry body for Australia's commercial free-to-air television broadcasters. We advance the interests of our members in national policy debates, position the industry for the future in technology and innovation and highlight the important contribution commercial free-to-air television makes to Australia's culture and economy.

Free TV proudly represents all of Australia's commercial free-to-air television broadcasters in metropolitan, regional and remote licence areas.



Our members are dedicated to supporting and advancing the important contribution commercial free-to-air television makes to Australia's culture and economy. Australia's commercial free-to-air broadcasters create jobs, provide trusted local news, tell Australian stories, give Australians a voice and nurture Australian talent.

Free TV Australia have no comment on:

- Questions 1 to 3 in relation to RLAN radiocommunications transmitters in the 5150–5250 MHz band;
- Question 10 in relation to Underground Wireless Broadband;
- Question 11 in relation to Radiocommunications receivers communicating with satellites in the 915–928 MHz and 2400–2483.5 MHz bands.

We note comment is invited from interested stakeholders about possible future arrangements to facilitate new Wireless Multi-channel Audio System (WMAS) technologies. As stakeholders in this issue, being both primary users of the 520-694MHz band and users of PMSE equipment, we submit the following comments.

Question 4

What should be the maximum EIRP for WMAS devices in the 520–694 MHz and 1785–1800 MHz bands?

We suggest retaining the current 100mW maximum EIRP limit. Any increase to this limit would trigger studies to investigate the impact on existing services. The current limit has proven to be a satisfactory compromise, providing sufficient signal level for practical use while not being shown to cause objectionable interference to existing services.

Question 5

Should a maximum bandwidth limitation be implemented for WMAS devices? If so, what should the maximum emission bandwidth be?

We suggest a maximum bandwidth of 7MHz, or whole multiples thereof, should be implemented for WMAS devices. 7MHz being the bandwidth of the primary television services in the band.

Question 6

Should a WMAS emission in 520–694 MHz be limited to fall entirely within a single TV channel? For emissions greater than a single TV channel, should a whole number of TV channels be required (for example, emission bandwidths of 7 MHz or 14 MHz)? Should any other limitations regarding the relative positioning of WMAS emissions with respect to the TV channel raster be implemented?

We recommend emissions should be limited to fall entirely within a single (unused) TV channel. We also suggest for emission bandwidths greater than a single TV channel, a whole number of TV channels should be required. If multiple TV channels are occupied, the occupied channels should all fall within one of the recognised 6-channel ‘blocks’ used for TV channel planning in Australia.

Question 7

Should a minimum spectral efficiency limitation be implemented for WMAS devices? If so, what should the minimum spectral efficiency be?

We suggest a minimum spectral efficiency limit should be implemented. We agree with the FCC proposal of 3 or more audio channels/MHz threshold, making it similar or better than existing narrowband devices.

Question 8

Should WMAS devices be required to comply with ETSI Standard EN 300 422?

We suggest WMAS devices should comply with ETSI EN 300 422, as it provides an international standard that can be referenced and which aligns with European and proposed US arrangements.

Question 9

Should new items be added to Schedule 1 of the LIPD class licence to facilitate WMAS, or should existing items be modified?

We would prefer to see items added with the relevant technical conditions to better specify acceptable use of equipment with wider bandwidth options.