

# Cambium Networks

## Variation to the Low Interference Potential Device Class License

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## 1. EXECUTIVE SUMMARY

Cambium Networks appreciates the opportunity to respond to the consultation of the variation to the LIPD class license.

We support the proposed variations to class licensing arrangements to support increased capability for wireless access services and other technology innovations, with specific reference to the proposed changes for radio local area network (RLAN) radiocommunications transmitters in the 5150–5250 MHz band.

Cambium Networks is a leading vendor of Fixed Wireless products, that supplies Point to Multipoint and Point to Point products that support the 900MHz, 2.4GHz, 3.3GHz to 3.9, 4.9GHz to 5.9GHz for Broadband Wireless Access (BWA), 6-38 GHz for PTP Fixed Microwave band, narrowband IoT SCADA solutions and Cloud Managed Wi-Fi and Ethernet Switches. Current PMP products are all TDD based whilst our PTP products are available as TDD or FDD.

The variation proposed to the Class License in the 5150MHz – 5250MHz band is of specific interest for our point to multipoint portfolio. Whilst the proposed changes do not fully align us with FCC (USA), but is the same as RSM (NZ), we support the proposed changes as an important step forward, but also request that consideration for an EIRP of 4W is considered in the future to allow for outdoor use to have greater utility.

## 2. INTRODUCTION TO CAMBIUM NETWORKS

At Cambium Networks, we support the communications of life for millions of people around the world and connect enterprise networks where other options cannot. No matter what the conditions or locations, wherever people or networks need to be connected, our wireless broadband solutions deliver clear voice, data and video communications people and networks can rely on.

Our Mission is Connecting the Unconnected and delivering solutions and technology that Bridge the Digital Divide.

Cambium Networks provides professional grade fixed wireless broadband, microwave, mmWave, narrowband IoT and Wi-Fi solutions. Our solutions are deployed in thousands of networks, in over 150 countries, with our innovative technologies providing reliable, secure, cost-effective connectivity that's easy to deploy and proven to deliver outstanding performance metrics. To date Cambium Networks has delivered over 13 million radio devices, a count that continues to accelerate year-over-year.

Cambium Networks are proven, respected leaders in the wireless broadband industry. We design, deploy and deliver innovative data, voice, and video connectivity solutions, through a qualified channel of distributors, Wireless Internet Service Providers, Telecommunications Companies, Value Added Resellers and System Integrators. Our solutions enable and ensure the communications of life, empowering personal, commercial, and community growth virtually everywhere in the world.

Following ten-years as a business unit within Motorola Solutions, Inc. Cambium Networks was established in 2011 following divestiture from Motorola Solutions. In July 2019 Cambium Networks was listed on the NASDAQ trading as a public company, CMBM.

### 3. ISSUES FOR COMMENT

3.1.SHOULD A SEPARATE NEW ITEM BE INTRODUCED TO FACILITATE HIGHER-POWER RLAN TRANSMITTERS IN 5150–5250 MHZ, OR SHOULD EXISTING ITEM 61 BE MODIFIED?

Cambium>> We suggest modification to Item 61, to reflect 30dBm (1W).

3.2.WHICH OF THE 2 SIMPLE EMISSION MASKS OUTLINED IN ITU RESOLUTION 229 (REV. WRC-19) SHOULD BE IMPLEMENTED IN AUSTRALIA FOR 1 W RLAN TRANSMITTERS IN THE 5150–5250 MHZ BAND?

Cambium>> We recommend the 2<sup>nd</sup> option:

“The maximum EIRP at any elevation angle above 30 degrees, as measured from the horizon shall not exceed 125 mW (21 dBm).”

3.3.SUBJECT TO WHICH EMISSION MASK IS IMPLEMENTED (SEE QUESTION 2), WOULD A DEVICE REGISTRATION SYSTEM (OR SIMILAR – SEE CANADIAN APPROACH ABOVE) BE NEEDED FOR OUTDOOR DEPLOYMENTS EXCEEDING 200 MW (23 DBM) TRANSMISSION POWER? NOTE THAT SUCH A REGIME WOULD REQUIRE FURTHER REGULATORY DEVELOPMENT. ACCORDINGLY, A DECISION TO IMPLEMENT SUCH A REGIME MAY DELAY ACCESS UNDER THOSE ARRANGEMENTS.

Cambium>> No device registration for 5150 – 5250 MHz @ 1W is suggested.

We note the importance of an AFC system when 4W EIRP is allowed in the 6GHz band and proposed we that effort to put in place an AFC system is accelerated.