The Manager

Spectrum Planning Section

Australian Communications and Media Authority

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

Thank you for the opportunity to comment on the paper listed above.

Profiles Resource Management (PRM) is Australia’s premier wireless spectrum management service for live events in Australia. We have a broad clientele that cover most major sporting events, large concerts, music festival and cultural activities such as the Australia Day festivities on Sydney Harbour each year. It is not unusual for us to have an event with 300 or more wireless devices under management.

PRM supports the changes to the LIPD regarding wireless devices, particularly the acceptance of international compliance standards.

We do however question the proposed definition of “indoors” in relation to the LIPD. The draft definition states that:

*“indoors means a space on or above land that is:*

*(a)          enclosed by permanent walls on all sides, a permanent roof and a permanent floor; and*

*(b)          permanently fixed to the land.”*

We contend that under this definition a building that is:

               (a)          enclosed by permanent walls on all sides, a permanent roof and a permanent floor; and

               (b)          permanently fixed to the land.

BUT is totally or predominantly below ground would be excluded.

For example, there are many performing arts centres including the Hamer Hall in Melbourne and the Theatre Royal in Sydney that are predominantly or totally below ground.

Both the examples mentioned are significant users of wireless microphones and in ear monitors. External TV signal are unmeasurable within the venue.

We would suggest the removal of the words “on or above land”.

**W. Peter Twartz Susan Twartz**