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The Manager  
Infrastructure and Equipment Safeguards Section  
Australian Communications and Media Authority

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### **Proposed changes to radiocommunications equipment regulation - consultation 37/2022**

Thank you for the opportunity to provide comment on the proposed changes to radiocommunications equipment regulation - consultation 37/2022 and also for the small extension to time.

Ai Group is a peak employer organisation representing traditional, innovative and emerging industry sectors. We have been acting on behalf of businesses across Australia for nearly 150 years.

Ai Group supports ACMA's proposal on changes to radiocommunications equipment regulation as outlined in the consultation paper "*Proposed changes to radiocommunications equipment regulation*". Specifically Ai Group agrees with ACMA to incorporate the content of the ACMA's 13 mandatory technical standards and the RLN into the General Equipment Rules. One of our members commented as follows:

*In the draft General Equipment Rule, Schedule 5, Part 15—Short Range Equipment Standard, subsection (4) listed 6 industry standards for testing of Short Range Devices that are included in Schedule 1 to the Radiocommunications (Low Interference Potential Devices) Class Licence 2015 (LIPD). Among those 6 industry standards, there was not on industry standard that would be applicable to LIPD devices of items 63AA and 63AB which are authorised to operate at 5925-6425 MHz.*

The two items of LIPDs (item 63AA and 63AB) are popular emerging technology in Wi Fi applications, i.e. WIFI 6e. Currently there is an European Telecommunications Standards Institute EN 303 687 which is applicable 6 GHz - WAS/RLAN Harmonised Standard for access to radio spectrum. This standard will be published by 10th January 2023. Ai Group recommends that ACMA include the ETSI EN 303 687 in Schedule 5, Part 15, subsection (4) as an applicable test method standard for Short Range Devices.

### **Responses to questions in the Consultation Paper**

#### **Question 1 - Do you have comments on the proposal to incorporate the content of the ACMA's 13 radiocommunications mandatory technical standards and the RLN into the General Equipment Rules?**

Ai Group Supports the proposal of incorporating the requirements of the radiocommunications technical standards and the provisions of the Radiocommunications (Compliance Labelling – Devices) Notice 2014 into the Equipment Rules.

**Question 2 - Do you have thoughts on the proposal to repeal the Radiocommunications (121.5 MHz and 243.0 MHz Emergency Position Indicating Radio Beacons) Standard 2014?**

Ai Group supports this proposal.

**Question 3 - Do you have any issues with the proposed adoption of the European Telecommunications Standards Institute standards specified in Appendix A?**

Ai Group recommends that ACMA add the European Telecommunications Standards Institute standard EN 303 687 - 6 GHz WAS/RLAN Harmonised Standard for access to radio spectrum to Schedule 5, Part 15, subsection (4) as an applicable test method standard for Short Range Devices operating at 5925 MHz to 6425 MHz.

**Question 4 - Do you have comments on the proposed remaking of the Protected Symbols Determination 2013, including the removal of reference to the C-Tick and A-Tick?**

The A-tick and C-tick marks were replaced by the RCM in February 2016. We do not believe that there would be any use cases of these marks. Ai Group supports the proposal to remake the Protected Symbols Determination 2013 and including the removal of reference to the A-tick and C-tick.

**Question 5 - Do you have thoughts on the proposed replacement of the interim EME Technical Report IEC TR 63170 in the General Equipment Rules with IEC/IEEE 63195-1 and IEC/IEEE 63195-2?**

ETSI is also working on standards similar to that of EN versions of IEC/IEEE 63195-1 and IEC/IEEE 63195-2. Ai Group recommends that when these EN versions become available in the future, they should be listed as applicable Standards.

**Question 6 - Do you have any issues with the proposed amendments to the significant event provisions to allow delegated ACMA staff to declare a significant event?**

Ai Group supports the proposal to amend the significant event provisions and to delegate ACMA staff to declare significant events. This revision provides more flexibility to allow the ACMA into small events such as trade shows and sport events.

We welcome the opportunity to discuss our submission with you further – please contact James Thomson on e-mail: [james.thomson@aigroup.com.au](mailto:james.thomson@aigroup.com.au).

Yours sincerely



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