



28 February 2022

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne VICTORIA

By email: SLPSConsultations@acma.gov.au

Dear Manager,

Review of scientific licensing arrangements

Thank you for the opportunity to provide feedback on the Australian Communications and Media Authority's (ACMA) Review of Scientific Licensing Arrangements Consultation Paper (**Consultation Paper**).

There are two categories of scientific licence: non-assigned and assigned. Based on the Consultation Paper we understand that the ACMA is considering replacing the non-assigned scientific apparatus licence category with a class licence, that would allow the same activities as currently available under non-assigned scientific licences. For assigned licences, the ACMA is broadly satisfied with operation of the regime and is not considering allowing scientific licences to be used for marketing trials. However, the option of short term non-renewable technical trials remains under consideration, subject to stakeholder interest.

Replacement of the non-assigned apparatus licence with a class licence

nbn is supportive of the ACMA's proposal to replace non-assigned scientific apparatus licences with a class licence, provided this is solely in respect of the limited use cases and conditions that are currently authorised under the *Radiocommunications Licence Conditions (Scientific Licence) Determination 2015* (the **Scientific LCD**).

The current Scientific LCD specifies the standard conditions applying to non-assigned scientific stations, based on three broad categories of use:

- Land station and mobile station, operated on four pre-determined sets of frequencies in the HF, VHF and UHF bands (subject to EIRP or maximum radiated power restrictions and maximum necessary bandwidth).
- Ultra-wideband applications, operating on any frequency up to 10.6 GHz, and between 22-26.5 GHz (subject to specified EIRP or field strength limits).
- Controlled emission applications (where transmissions are confined to a shielded room or all EME is dissipated into a non-radiating dummy load), operating on any frequency.



These existing uses are reflected in the *Draft Radiocommunications (Science and Research) Class Licence 2023* (Draft Class Licence), that the ACMA has provided for comment. **nbn** agrees with the ACMA that the interference risk profiles of these activities is low.

The proposed shift from non-assigned scientific licence to class licence should therefore be of limited risk to **nbn** because the proposed class licence essentially replicates the same categories and conditions as the existing arrangements.

Assigned scientific licences

We agree with the ACMA that the existing assigned scientific licensing framework is operating as intended.

The proposal to potentially allow short term trials (for example 60 days) on a non-renewable basis is of limited interest to **nbn**. At this time we are not envisaging conducting trials of such a limited duration. The non-renewal policy would pose a significant execution risk, given the need to align the timing of multiple activities for trials including the acquisition and installation of bespoke equipment, and the co-ordination of multiple parties to successfully trial new technologies in an end to end field test environment.

For these reasons **nbn** has previously suggested a timeframe of nine months for short term trials, as an alternative to the ACMA's proposed period of less than 60 days.

However, we agree in principle that the publication of guidelines regarding how the ACMA considers trials will provide greater transparency for stakeholders.

If you would like to discuss these matters further please contact Justine McCarthy, Principal Regulatory Advisor – Consumer and Network [REDACTED]

Yours sincerely

Sarah Alderson
General Manager Regulatory Affairs – Consumer and Network