



MOTOROLA SOLUTIONS

July 19th, 2023

The Manager, Wireless Broadband
Spectrum Planning and Engineering Branch
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Response to the Consultation paper on the Proposal to remake the Public Safety and Emergency Response Class Licence

Motorola Solutions is pleased to provide the attached comments responding to The Australian Communications and Media Authority's *"Proposal to remake the Public Safety and Emergency Response Class Licence."*

Please let me know if you have any questions about this response.

Yours sincerely,

Krishna Formiga
Regional Director, Government Affairs
Spectrum and Regulatory Policy
Motorola Solutions
[REDACTED]



Motorola Solutions, Inc. (MSI) thanks The Australian Communications and Media Authority (ACMA) for the opportunity to comment on its public consultation on Radiocommunications (Public Safety and Emergency Response) Class License 2023.

Motorola Solutions is a global leader in public safety and enterprise security. Our solutions in land mobile radio communications, video security & access control and the command center, bolstered by managed & support services, create an integrated technology ecosystem to help make communities safer and businesses stay productive and secure. We serve over 100,000+ customers in 100 countries, with 20,000+ employees in 60 countries and an install base of more than 13,000 networks worldwide. We have been a leader in the field of radiocommunication for over 90 years.

MSI supports ACMA's efforts to ensure that mobile broadband capabilities meet the long-term needs of public safety agencies and the operation of Land Mobile Radio (LMR) networks currently deployed. In addition, MSI believes PSBs (Public Safety Bodies) must have sufficient access to adequate radiofrequency spectrum to enable them to serve their communities efficiently.

Please find below MSI's responses to selected questions posed by the consultation.

Question 1

Is the class licence still needed? Why or why not?

MSI recognizes the need for the class license to ensure the effective and efficient operation of PSBs. MSI believes that class license provides a reliable and optimized framework for PSBs to deploy communications infrastructure and facilitates spectrum use for multiple purposes while eliminating the need for apparatus licenses for individual devices.

MSI supports ACMA's views that the class license is necessary to support the operations of PSBs, and, therefore, should be remade.

Following ACMA's preliminary discussion in February and March 2023 on the use of the 4940-4990 MHz band for public safety, MSI supports the continued use of the band to support PSB's operations and the expansion to enable the use of 5G technologies in addition to the services currently authorized.

Question 2

Is the class licence operating effectively and efficiently? Why or why not?

Considering the results of the preliminary discussions conducted by ACMA in February and March 2023 with key stakeholders, and the responses provided by them, MSI believes that the class license is operating effectively.

Generally, regulatory frameworks that optimize the access and use of spectrum bands by PSBs are critical to ensure the adoption of new technologies and their rapid deployment. The authorization of 5G devices under the class license will facilitate adoption of the technology and the efficient deployment of 5G networks to meet the growing demands of PSBs users, in addition to the LMR networks in operation, without adding regulatory delays.



Question 3

How are PSBs currently using the class licence? Are the current authorised services fit-for-purpose?

No comments.

Question 4

Is the current class licensing model fit-for-purpose? Why or why not? How would any interference protection or hybrid class / apparatus licensing arrangements work?

MSI believes that the current class licensing model serves the purpose of enabling PSBs to easily and rapidly deploy networks and services to support their operations during emergencies.

The current licensing model enables multiple use to meet the current demands of PSBs in different operational settings. MSI understands that some PSBs have expressed their desire to add mobile technologies to the class license to meet their needs for broadband data transmission in addition to the continued access to the narrowband LMR legacy systems.

The 4940-4990 MHz band is largely harmonized for PPDR in multiple regions. The band also falls within the 4400-5000 MHz band range, part of which has been identified for IMT (International Mobile Telecommunications) in some countries. The 3rd Generation Partnership Project (3GPP) has developed specifications for standard new radio (5G) technologies under the band designation 'n79'.

Considering the evolving demands of PSBs and the technology available in the 4940-5000 MHz band, MSI supports a regulatory framework that enables flexibility in deploying multiple technologies and adopting various types of networks to support the operation of public safety and emergency response operations. We recommend that ACMA enable the use of 3GPP-based cellular mobile technologies under the existing class license in addition to the existing authorized services. This approach is similar to that proposed recently by the U.S. FCC and is under consideration by other countries as well.

Question 5

Should specific provisions for cellular mobile technologies be included in the class licence? Why or why not?

MSI agrees that specific provisions for cellular mobile technologies be included in the class licence to mitigate interference and enable coexistence with the additional authorized services.

Question 6

Are the proposed emission mask, power limit and EIRP limit for cellular mobile BS appropriate? Does emission mask P, in conjunction with other proposed measures, sufficiently mitigate the risk of adjacent channel interference to other devices authorised under the class licence?

MSI supports the use of 3GPP masks for equipment in the 4.9 GHz band. MSI considers that the base station radiated power levels are low at 33 dBm/MHz which would limit cell ranges, especially in 4.9 GHz. MSI suggests ACMA adopts higher BS EIRP levels of 39 dBm/MHz, or 52 dBm/20MHz to ensure larger cell ranges.



Question 7

Are the proposed emission mask, power limit and EIRP limit for cellular mobile user equipment appropriate?

MSI supports the use of 3GPP masks for equipment in the 4.9 GHz band.

Question 8

Are the emission masks, power limits and EIRP limits for existing services appropriate?

No comments.

Question 9

Do the technical parameters proposed in the draft class licence restrict the use of any other technologies required by PSBs?

No comments

Question 10

Do the current definitions of 'public safety bodies' and 'public safety or emergency response function' remain fit-for-purpose? Do the authorisation arrangements for other bodies remain appropriate? Why or why not?

MSI believes that the provisions included in sections 8 and 10 of the draft class licence remain appropriate as they ensure that the class license continues to be used by Public Safety Bodies (PSBs) or other bodies authorized by them.

Question 11

Is the 6-month limit for fixed point-to-point services appropriate? Why or why not? Does the 6-month limit prevent deployments of networks aligned with the purpose of the class licence?

No comments.

Question 12

Which channel plan should be adopted in the class licence? Why?

MSI supports ACMA's proposed modification to the class licence to be compliant with Recommendation ITU-R M.1826-1.

In addition, APT Recommendation No. APT/AWF/REC-01 (Rev.1) on USE OF THE BAND 4940-4990 MHz FOR PUBLIC PROTECTION AND DISASTER RELIEF (PPDR) APPLICATIONS, recommends that "The



MOTOROLA SOLUTIONS

frequency band 4940-4990 MHz or parts thereof may be used to support broadband networks designed for PPDR high rate data and video information transfer.”

The channel plan provided as an example in the APT/AWG recommendation is consistent with the Channeling plan B for 4940-4990 MHz (Table 2) of Recommendation ITU-R M. 1826.1.

MSI recommends the adoption of Channelling plan B provided that the existing services are not unduly impacted by its adoption.