



TELSTRA LIMITED

Submission to ACMA Consultation:

Spectrum planning framework:

Draft frequency coordination requirements review
work program 2023–24

Public Submission

21 July 2023



1 Introduction

We welcome the opportunity to make this submission to the Australian Communications and Media Authority's (ACMA) consultation on the **Spectrum planning framework: Draft frequency coordination requirements review work program 2023–24**. Our submission makes three recommendations.

2 Recommendations for the Program of Work

Overall, we support the ACMA's proposed schedule of activities described in Table 1 of the consultation paper. We have two recommendations to propose in relation to the program of work, and one further suggestion on Embargo 78.

2.1. Delay updating MS33 and MS34 until to Q1 2024

We propose the ACMA delay its updates to the 1.8 GHz RALI (RALI MS34) and the 2.1 GHz RALI (RALI MS33) until **Q1 2024**. Both are currently scheduled to occur somewhere between Q3 of 2023 and Q1 of 2024, and we are requesting this delay because these are lower priority activities, and we do not have the capacity to do the work required in 2023, alongside a spectrum auction, TLGs and other work.

A delay until Q1 2024 is still within the window in Table 1, and we consider the delay in updating these two RALIs will not adversely impact the industry.

2.2. RALI MS35 should be reviewed within the 2.5 GHz TLG

The ACMA observes RALI MS35, *Coordination of 2.5 GHz band spectrum licensed transmitters with radiodetermination stations operated by the Department of Defence in the 2700–2900 MHz band*, does not require review at this time. The 2.5 GHz band is scheduled to have a TLG commencing at the conclusion of the 700 MHz TLG.¹ The purpose of the 2.5 GHz band TLG is to “modernise” the 2.5 GHz band for 5G, and it would be prudent to consider whether changes to the 2.5 GHz Spectrum Licence Technical Framework (SLTF) require the coordination procedures in RALI MS35 to be altered in any way.

As such, we consider it worth including a review of RALI MS35 within the 2.5 GHz band TLG.

2.3. Review Embargo 78 to support the issuing of 3.8 GHz Metro & Regional AWLs

While this consultation is orientated towards the RALI program of work, the introduction to the consultation explains that the process of reviewing spectrum planning technical frameworks to ensure they remain current and consistent encapsulates two key elements, the second of which is “*consideration of spectrum licence technical frameworks and ensuring the continuing appropriateness of spectrum embargoes.*”

So, while commentary on embargos is not strictly within the bounds of this consultation, they do form a part of the overall management of spectrum technical frameworks. We observe that Embargo 78² will require review, or more likely, revocation, as it currently prohibits all new frequency assignments in 3700-4000 MHz, Australia wide and appears to prevent the ACMA from issuing AWLs in remote areas, for which the ACMA opened applications on 17 July 2023. We recommend that the ACMA reviews Embargo 78 accordingly.

¹ Draft FYSO for consultation, March 2023, Table 3, p.53, entry for the 2.5 GHz band.

² Embargo 78 is available at: <https://www.acma.gov.au/sites/default/files/2020-07/Embargo%2078.pdf>