

Australian Communications and Media Authority (ACMA)
Red Building, Benjamin Offices, Chan Street
BELCONNEN ACT 2617



21 July 2023

Re: ACMA Consultation Paper—*Draft frequency coordination requirements review work program*

Dear Sir/Madam

AMTA appreciates the opportunity to comment on the proposal to remake the Draft frequency coordination requirements review work program.

We note that AMTA and its members are very interested in the consultations which will review (or result in the review of) the Radiocommunications Assignment and Licensing Instructions (RALIs)

- MS47 in the 3.4-4.0 GHz band;
- FX16, FX22 & LM08 in the 800 MHz band;
- MS33 & MS34 in the 2 GHz and 1800 MHz bands (respectively);
- FX19, with the potential to affect the 2 GHz band; and
- FX03 in the microwave fixed link bands,

and we look forward to participating in those consultations.

With respect to the review of RALIs MS33 & MS34, we note that the ACMA has planned this review for Q3 2023 – Q1 2024. This period coincides with the spectrum licence auction of the 3.4 and 3.7 GHz bands and the 700 MHz TLG, which tie up a lot of the spectrum planning resources for the mobile industry. As such, we request that the review of RALIs MS33 & MS34 be postponed until Q1 2024.

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. We note 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 may 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 with the 2.5 GHz band TLG.

Lastly, we also direct the ACMA to the comments we made in response to IFC 25/2021 (with the same name as this consultation being responded to)—we believe these are still valid and ask that the ACMA consider (a) our 2021 comments in its review of RALI LM8; and (b) the possible future review of RALI MS 37.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Coughlan', is written over a light blue horizontal line.

Chris Coughlan
Head of Spectrum and Network Infrastructure
Australian Mobile Telecommunications Association Ltd ([AMTA](http://www.amta.org.au))

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