

31 March 2023



The Manager

Major Spectrum Allocations Section
Australian Communications and Media Authority
PO Box 13112
Law Courts Melbourne VIC 8010

Dear sir

RE: Draft allocation and technical instruments for the 3.4/3.7 GHz bands auction

The Communications Alliance's Satellite Service Working Group (SSWG) wishes to thank the Australian Communications and Media Authority (ACMA) for the opportunity to provide feedback on the *Draft allocation and technical instruments for the upcoming 3.4 and 3.7 GHz bands auction Consultation Paper* (the '*Consultation Paper*').

The SSWG continues to have significant concerns with regards to on-going access to satellite C-band downlink spectrum in Australia which we have raised on a number of occasions through submissions to earlier ACMA consultation papers on the introduction of Wireless Broadband (WBB) into the 3.4 – 4.0 GHz band.

In relation to this most recent *Consultation Paper*, the SSWG is concerned with the assumed RF filtering to be used for FSS Earth station receivers and the proposed date for which the filters will be considered to be installed. Specifically in the draft '*Frequency coordination and licensing procedures for Area-Wide Licences (AWL) in the 3400–4000 MHz band*' (page 22, RALI MS47), it states:

"For earth receive stations licensed on or after 16 July 2022, the filter is to be assumed to apply below the lower and above the upper frequency limits of the licence."

In the *Consultation Paper* (page 75), it is proposed that FSS operators will be given a 'reasonable period of time' to obtain customised filters before the upper frequency filter limits are assumed for coordination. It now appears that the 'reasonable period of time' only applies to the Earth Station receiver licences issued before 16 July 2022. The SSWG has significant concern with this plan and suggests that the upper frequency filter limits should only apply after 16 July 2027, in all cases, to give FSS operators a 'reasonable period of time' to source and install customised filters to avoid major disruption to services provided within Australia and Australian citizens. Furthermore, it seems unreasonable that a condition be placed on a service before the condition was communicated to the affected parties.

We look forward to receiving your response on this matter. If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Stanton', written in a cursive style.

John Stanton
Chief Executive Officer

About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:

<http://www.commsalliance.com.au/>