

The Manager
Space Systems Section
Spectrum Planning and Engineering Branch
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

ACMA Consultation: Review of Australian Satellite Filing Procedures
- CSIRO Comments -

Dear Mark,

CSIRO thanks ACMA for the opportunity to comment on the ACMA Consultation: [Review of Australian Satellite Filing Procedures](#) dated September 2023.

CSIRO is responsible for the management and operation of the Canberra Deep Space Communication Complex (CDSCC) and other NASA facilities in Australia under a government to government treaty between Australia and the USA as well as a Cooperating Agency Agreement between CSIRO and NASA. CSIRO is also responsible to manage the operations of the European Space Agency (ESA) space research activities in Australia, including the operation of the Space Research Services (SRS) earth station at New Norcia in W.A. under the provisions of a long-standing Treaty between the Australian government and ESA. Therefore CSIRO, in addition to its role as manager of CDSCC, in making this submission also represents its partner space agencies (NASA and ESA) for whom it provides these Treaty level services at CDSCC and New Norcia, respectively.

CSIRO has reviewed the ACMA consultation document and is pleased to offer some observations and suggestions, as outlined below.

CSIRO Comments.

CSIRO largely agrees with the broad range of general criteria presented in this draft ACMA proposed procedures document. However, there is one critical area that appears deficient in not adequately addressing the unique, but very important aspect of coordination (when relevant) with the Space Science Service Earth stations managed in Australia by CSIRO under the long-standing government-to-government and government-to-Agency Treaty arrangements outlined above. This aspect is becoming more important with the increasing trend toward new, additional primarily commercial Earth stations supporting the rapidly increasing number of NGSO systems in low-Earth orbit. The space research stations, managed by CSIRO, are

(and have been for over 50 years) critically reliant on the uncompromised preservation of the stringent interference protection requirements for their ongoing support of the large (and increasing) scientific spacecraft tracking support demands being placed on these stations by NASA and ESA, as their space exploration activities continue to increase well into the future. While coordination and interference protection criteria for many of the licensed SRS bands is defined in RALI MS43, this RALI does not cover S-Band with its stringent protection criteria provided in ITU-R SA.1157-1. S-Band protection is of current and ongoing importance to operations at both sites, but particularly for Tidbinbilla.

These defined receive protection criteria are not specifically evident in the filings procedures document and could well be overlooked in the processing and approval of new Earth station support capabilities.

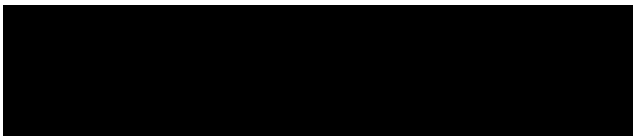
CSIRO therefore believes that inclusion of a procedural clause(s) in the Australian Satellite Filings Procedures document, specifically referring to the requirement for ACMA (as a regulatory facilitator within the terms of these Treaties) to review and (where relevant) direct prospective new operators to coordinate with CSIRO to assure Australian compliance with the Space Research Treaty obligations. The critical criteria applies to the SRS reception bands (near-Earth and deep space), while the uplink bands will be of relevant interest to prospective new operators from the point-of-view of their exposure to (and their acceptance of) possible interference, noting that such interference to their systems cannot impose any consequential restrictions on the normal operations of the SRS Earth station emissions.

CSIRO thankfully recognises and is very grateful to ACMA for its conscientious practices to date in pursuing these outcomes and facilitating coordination (by default, as a matter of personal and close cooperative interactions), with excellent regulatory outcomes which have assured the preservation of the stringent, critical operations environments at Tidbinbilla and New Norcia. Notwithstanding, CSIRO sees this review of the satellite filing procedures document as an opportune moment to include in this document these specific, but crucial, coordination procedural criteria, as possible consultative triggers for consideration by ACMA.

Accordingly, CSIRO would greatly appreciate ACMA's consideration and agreement to include these small, but very important additional procedural clauses to assure complete coverage and obviate any possible, unintended oversight.

Thank you for the opportunity to consider and provide comment on this consultation document.

Yours Sincerely,



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18th October 2023