



Submission in response to
ACMA consultation

**Further updates to
spectrum arrangements
for cordless
communications devices**

PUBLIC VERSION

August 2024

OPTUS RESPONSE TO ACMA CONSULTATION

1. Optus welcomes the opportunity to provide feedback to the Australian Communication and Media Authority's (ACMA) consultation on further proposed changes to the *Radiocommunications (Cordless Communications Devices) Class Licence 2024* (the CCD Class Licence), which was recently remade and came into effect on 1 July 2024.
2. Optus understands that the purpose of this consultation is to seek stakeholder feedback on the proposed removal of the "private use only" condition under section 8 of the CCD Class Licence that currently limits operation of a CCD to the provision of a carriage service within a provider's "immediate circle". The proposed variation would also involve removal of the definition of "immediate circle" and associated notes under section 5 of the CCD Class Licence.
3. The proposed variation is made in response to feedback from the Digital Enhanced Cordless Telecommunications (DECT) Forum to the ACMA's April 2024 consultation that the "private use only" condition under section 8 is too restrictive and may not support emerging use cases and applications of DECT.¹
4. Optus supports the ACMA's proposed variation to the CCD Class Licence on the understanding that CCD use remains confined to the frequency bands set out under the definition of CCD in section 5 of the CCD Class Licence and in accordance with the remaining conditions in Part 3 of the CCD Class Licence. Specifically, CCD that use DECT technology should only operate in the 1880 MHz to 1900 MHz frequency band.
5. In this context, Optus reiterates the following position expressed in our response to the ACMA's March 2023 consultation on "replanning of the 1880-1920 MHz band" that:

"If the new 1.9 GHz band plan results in interference or restrictions in either of the 1.8 GHz or 2.1 GHz bands, the impacts on the existing mobile networks and services will be significant.

Accordingly, Optus submits that any new assignment in the 1.9 GHz band should not:

 - (a) *Cause any interference with the adjacent bands, particularly with the 2.1 GHz Uplink; nor*
 - (b) *Mandate any new deployment restrictions in the adjacent bands, i.e., 1.8 GHz and 2.1 GHz bands.*²
6. Optus also notes that the ACMA discusses the possibility of considering whether the arrangements governing CCD under the CCD Class Licence should be incorporated into the Low Interference Potential Devices (LIPD) Class Licence. We will provide further comment if and when the ACMA considers this proposal as part of any future LIPD variation process.

¹ DECT Forum submission – remaking the CCD class licence, May 2024

² Optus submission, March 2023; p.4