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The Manager, Wireless Broadband
Spectrum Planning and Engineering Branch
Australian Communications and Media Authority
PO Box 78
BELCONNEN ACT 2616

**Reply to Comments on 1800 MHz and 2 GHz bands outside of spectrum licensed areas
– review of arrangements**

DB Telecommunications Pty Ltd is pleased to be able to offer some comments on the various submissions to the ACMA's recent consultation.

Spectrum Arrangements

DB Telecommunications believes that the suggestion made by AMTA, Optus, Telstra and others to consolidate MNO assignments for remote areas into the 1800 MHz band and non-MNO assignments into the 2 GHz band has some merit and is worthy of serious consideration by the ACMA.

On balance this solution would allow MNOs to make more efficient use of spectrum in the 1800 MHz band and could potentially provide non-MNO users with better access to spectrum in the 2 GHz band.

DB Telecommunications acknowledges that this proposal has cost implications for those organisations that have already established networks in either of the two bands, which would require careful consideration and is likely to require a lengthy transition period, perhaps up to 4 years as suggested by Telstra.

DB Telecommunications supports comments made in a few responses that any new PTS licences issued for the 1800 MHz and 2 GHz bands have advisory notes that require the use of equipment which is capable of deployment in either of the 1800 MHz or 2 GHz Bands, in order to support the longer-term restructuring of the 1800 MHz and 2 GHz bands.

Point to Point Links

Although DB Telecommunications has not directly experienced any issues with 1800 MHz and 2 GHz PTP links blocking potential PTS licence assignments, the submissions of AMTA, Optus and Telstra provide compelling evidence that the presence of these legacy PTP

links in the band are limiting the ability of the MNOs in particular, to secure PTS licences in many areas.

DB Telecommunications would support the proposal by many of the respondents for the clearance of legacy PTP links from the 1800 MHz and 2 GHz bands.

Spectrum Availability Issues

A common theme amongst many of the submissions was that the ACMA needs to adopt some form of “use it or lose it (UIOLI) provisions” to eliminate opportunistic hoarding of spectrum which is preventing legitimate users from gaining access to 1800 MHz and 2 GHz spectrum in various areas.

DB Telecommunications notes that the ACMA is making quite a concerted effort to enforce the UIOLI conditions associated with LPON licences and DB Telecommunications would argue that the 1800 MHz and 2 GHz bands support a more valuable segment of the economy than LPON licences. Perhaps some of the desktop audit steps contained in the LPON compliance action could be a useful first step in identifying unused spectrum in the 1800 MHz and 2 GHz bands.

DB Telecommunications understands the ACMA’s concerns regarding the administrative burden that enforcing UIOLI provisions might entail, but in its submission, Pivotel offered some suggestions on some simple steps the ACMA could undertake to enforce UIOLI provisions while minimizing the administrative burden.

In paragraph 46 of its submission, Optus provided a suggestion of using renewal statements to help enforce UIOLI provisions while minimizing the administrative burden, particularly if targeted at problem areas or problem licensees.

Many respondents did not view the proposed OTT licensing as a sound alternative to having proper UIOLI provisions in the 1800 MHz and 2 GHz bands.

If you would like additional information or wish to discuss any aspect of my submission, please do not hesitate to contact me on 0412 991 474 or by email dbritt@dbtelecomm.com.au.

Yours sincerely,



David Britt
Director