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Expiring spectrum licences: Stage 2. Information gathering, and views on uses of frequency bands and alternative licence conditions

Dear Sean,

Viasat-Inmarsat thank the ACMA for the opportunity to comment on the Expiring Spectrum Licences, Stage 2, information gathering and views. Viasat-Inmarsat would like to raise some specific issues of concern on the 3400-3700 MHz portion of the ESL review as follows:

Currently FSS earth stations are licensed in the 3400-3700 MHz and 3700-4200 MHz bands in the Earth Station Protection Zones (ESPZs) and the protection from interference of these areas for FSS licensees should be maintained with any changes to the ESL bands.

FSS earth stations are also licensed in the adjacent band 3700-4200 MHz in non-ESPZ areas, and protection of existing and future FSS should be maintained, and in some areas improved, in any changes to the ESL in the 3400-3700 MHz band.

- Viasat-Inmarsat would not support any move to vary ESL unwanted emission limits such that the frequency boundary between non-spurious and spurious emission limits (currently 3840 MHz) be increased to 4040 MHz, since FSS ES receivers are extremely sensitive to out-of-band emissions.
- Viasat-Inmarsat would encourage ACMA to maintain limits on the unwanted (out of band and spurious) emissions of base stations¹ and devices operating in the ESL, noting that this is the predominant interference factor for adjacent channel FSS.

¹ Maintain the protection requirements in Section 4.3 (3) of *Radiocommunications Advisory Guidelines (Managing Interference from Spectrum Licensed Transmitters – 3.4 GHz Band) 2015*.



We look forward to ACMA considering these matters, as a number of important services could be at risk above the 3400-3700 MHz range.

Best regards,



Senior Director, Government and Regulatory Affairs
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