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Australian Government

Defence

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**EXPIRING SPECTRUM LICENCES: STAGE 2 INFORMATION GATHERING, AND  
VIEWS ON USES OF FREQUENCY BANDS AND ALTERNATIVE LICENCE  
CONDITIONS**

**References**

- A. Expiring spectrum licences: stage 2 – Information gathering, and views on uses of frequency bands and alternative licence conditions, the ACMA, March 2024
- B. Approach to expiring spectrum licences, the ACMA, May 2023

1. Defence appreciates the opportunity to provide a response to the consultation paper on stage 2 of the expiring spectrum licences consultation process provided in Reference A. Defence understands that the expiring spectrum licences (ESLs) process has been progressed to the stage 2 out of the 4-stage ESLs process. It is our understanding and as elaborated in Ref B that stage 2 intends to finalise the process and request relevant information from incumbent licensees to assist in developing an assessment framework.
2. Defence Strategic Review observed that Australia's strategic environment has changed and as such demands a fundamentally new approach to the defence of Australia and its interests. This new approach is based on the concept of *National Defence* – a coordinated, whole-of-government and whole-of-nation approach that harnesses all arms of national power to defend Australia and advance our interests.
3. Defence would also like to take this opportunity and invite the ACMA to consider the recommendations provided in the 2024 National Defence Strategy (NDS) and assist Defence in delivering the specific defence capabilities listed in the 2024 Integrated Investment Program (IIP) that Government will invest in.
4. Defence understands that advanced radiofrequency communications, including 5G and 6G, are considered to be critical technologies that can impact Australia's national interest, including economic prosperity. It is worth acknowledging Australian Government recommendation provided in 2024 NDS related to this topic:

‘This National Defence Strategy acknowledges that Australia's security and prosperity are inextricably linked. Australia's future depends in large part upon protecting our economic connection to the world, upholding the global rules-based order, maintaining a favourable regional strategic balance and contributing to the collective security of the Indo-Pacific.’

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5. By having recently reported change of the Australian strategic environment, more balanced approach is required on the critical issues such as national security and national prosperity, and Defence understands that this approach will be considered while finalising ESLs framework.

Defence interest in 2.5 GHz mid band gap

6. Defence currently operates land, sea and air mobile systems in the 2.2 GHz (2 200 to 2 290 MHz) frequency band under the mobile service.

7. Defence access in the 2 200-2 290 MHz is risk managed through coordination with the television outside broadcast (TOB) community where appropriate and good engineering practice. The inherent compatibility is due to itinerant uses between both communities enables continuing operation without harmful interference effects. Due to growth of Defence use of the 2200-2290 MHz in the S-band frequency range, Defence considers that the 2.5 GHz frequency band can fulfil increasing Defence requirements into the future, along with continued utilisation of the 2200-2290 MHz frequency band.

8. Defence would like to invite the ACMA to consider the growing spectrum demands for Defence by noting that future Australian Government investment in Australian Defence Industry are listed in 2024 Integrated Investment Program (IIP).

9. Defence understands that information paper (ref A) requests additional information from all prospective users on the alternative uses, use cases and public benefits which is provided in Annex A.

10. My point of contact is [REDACTED] or via email [REDACTED]

Yours sincerely

[REDACTED]

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**Information requested from prospective alternative licensees**

1. Defence would like to express an interest in accessing the 2.5 GHz mid band gap mostly across training areas but noting that there might be occasions when a greater operational area including Australia wide would be required.
2. Defence understands that TOB community will continue to operate in the 2.5 GHz mid band gap. Considering the inherent compatibility between TOB and Defence services based on proven co-existence lasting over the decades in the 2.2 GHz band, Defence would be comfortable to share the 2.5 GHz mid band gap with TOB community.
3. Defence would support licensing arrangements with current and future prospective licensees that enables sharing. Across international spectrum management community, when sharing is possible, it is regarded as one of the approaches delivering flexibility in spectrum management.

Public interest criterion 1: facilitates efficiency

4. While Defence is interested in use of entire 2.5 GHz mid band gap (2570-2620 MHz), utilizing this band would be mostly within geographic areas already designated to Defence. The proposed usage would make a perfect candidate for sharing with current users – TOB community. It is our understanding that TOB community plans to continue utilisation of this band around 26 fixed receive sites. Well-established practice and proven experience in usage of the 2.2 GHz band in addition to inherent compatibility between TOB and Defence applications, would ensure most efficient and effective use of this band across Australia.

Public interest criterion 2: promotes investment and innovation

5. As listed in 2024 Integrated Investment Program, the Government will invest in a number of capabilities. This investment will progress the development of the unique Australian technology and defence industry.
6. The Government plans considerable investment into developing joint warfighting networks and applications that will improve communications access for ADF forces operating in challenging environments.

Public interest criterion 4: balance public benefits and impact

7. By enabling access to the 2.5 GHz mid band gap, numerous previously listed capabilities will be supported. Defence recognises the spectrum as a part of warfighting domain, and by providing additional access to spectrum even via sharing arrangements, the ACMA will be in position to further contribute to Defence's ability to defend Australia and its national interests.
8. This spectrum access will also contribute to improved interoperability with allies and partners which further improve Australia's strategic interests and promote regional and global security and stability as directed by the government.