



10900-B Stonelake Boulevard, Suite 126 • Austin, Texas 78759 U.S.A.
Phone: +1-512-498-9434 (WIFI) • Fax: +1-512-498-9435
www.wi-fi.org

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VIA ELECTRONIC FILING AT: [ONLINE SUBMISSIONS](#)

Re: **Consultation Paper: Proposed Update to the Australian Radiofrequency Spectrum Plan, November 2024**

Dear Colleagues,

Wi-Fi Alliance commends the Australian Communications and Media Authority (the “ACMA”) on its ongoing work in the areas of spectrum management and frequency planning. The [Consultation Paper: Proposed Update to the Australian Radiofrequency Spectrum Plan](#) (“*Consultation Paper*”) is a valuable tool for the ACMA to solicit information on the optimal use of the radio frequency spectrum. Wi-Fi Alliance enthusiastically supports the ACMA’s efforts and appreciates the opportunity to provide its recommendations.

Wi-Fi Alliance supports the ACMA’s proposed update to the Australian Radiofrequency Spectrum Plan to reflect decisions of the 2023 Radiocommunication Conference (WRC-23) on the 6.425-7.125 GHz frequency band. In considering modifications to the Australian allocations listed in Column 2 of the Table of Frequency Band Allocations in the spectrum plan, Wi-Fi Alliance respectfully calls on the ACMA to recognize that the international footnote No. 457E explicitly stipulates that in Region 3, the frequency band 7.025-7.125 GHz is “*used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs).*”

Wi-Fi Alliance further asks the ACMA to consider that numerous spectrum-sharing studies undertaken in preparation for WRC-23 and in various countries’ domestic proceedings confirm that International Mobile Telecommunications (IMT) deployments in the 6.425-7.125 GHz (“upper-6 GHz”) frequency band are not compatible with the incumbent fixed point-to-point, satellite and broadcasting operations. To maintain the necessary quality of service, the *commercially viable* IMT networks require priority access to the spectrum. With priority spectrum access, the IMT networks cannot avoid interfering with and/or tolerate interference from the incumbent operations in the upper-6 GHz band. Conversely, extensive technical studies along with real-world Low Interference Potential Devices (LIPD) class licence deployments in the lower-6 GHz band provide the ACMA with ample evidence that RLANS (e.g., Wi-Fi) can operate and protect important incumbent operations in the upper-6 GHz band. For example, the ACMA correctly concluded that the RLANS can effectively protect the Television Outside Broadcast operations in the 7100-7125 MHz band.^{1/} And Wi-Fi industry is committed to implementing technical, operational, and regulatory solutions that ensure coexistence with ongoing and future incumbent operations in the 7.025-7.125 GHz band.

^{1/} See ACMA Future Use of the Upper-6 GHz Band Options Paper at page 13, available at [future_use_of_the_upper_6_ghz_band_options_paper.pdf \(acma.gov.au\)](https://www.acma.gov.au/future_use_of_the_upper_6_ghz_band_options_paper.pdf)

Lastly, Wi-Fi Alliance asks the ACMA to take into account that Wi-Fi has become increasingly important in connecting people and devices everywhere and access to the 6.425-7.125 GHz spectrum is critical for futureproofing of Wi-Fi's ability to deliver connectivity in Australia. The latest Wi-Fi technology ([Wi-Fi 7](#)), designed to operate in the 5.925-7.125 GHz band, is already on the market, empowering connectivity benefits which are ready to be delivered to the Australian enterprises, consumers, and the economy. As the 6 GHz regulatory landscape evolves, Wi-Fi Alliance member companies continue to expand the Wi-Fi 7 ecosystem even further. Initial deployments in the band included Wi-Fi 7 consumer access points, smartphones, computers, and televisions, followed by enterprise-grade access points. Industrial environments are also seeing a strong adoption of Wi-Fi 7 technology that supports various applications including machine analytics, remote maintenance, and virtual employee training. Access to less than the entire 6 GHz band (i.e., including the 7.025-7.125 GHz band) substantively reduces Wi-Fi 7 performance in terms of latency and data throughput. And, importantly, there are no alternative frequency bands that may address expanding Wi-Fi spectrum requirements in the future. In short, Wi-Fi 7 is designed to deliver unprecedented quality of service benefits at higher data rates and lower latencies, but its optimal performance depends on access to multiple wider (e.g., 320 MHz) channels in the 6 GHz band— without Wi-Fi access to 7.025-7.125 GHz band, Australian consumers and enterprises will not realize full benefits of Wi-Fi 7 and future generations of Wi-Fi technologies.

Wi-Fi Alliance appreciates the opportunity to contribute to ACMA's spectrum management efforts.

Respectfully submitted,

/s/ Alex Roytblat

WI-FI ALLIANCE

Alex Roytblat

Vice President of Regulatory Affairs

aroytblat@wi-fi.org