



Australian Government

Defence

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Defence Spectrum Office

The Manager

Spectrum Planning Section

Australian Communications and Media Authority

PO Box 78, Belconnen ACT 2616

**SUBJECT: RESPONSE TO THE PROPOSED UPDATE TO THE AUSTRALIAN  
RADIOFREQUENCY SPECTRUM PLAN**

**References:**

- A. Proposed update to the Australian Radiofrequency Spectrum Plan Consultation Paper, November 2024
- B. Australian Radiofrequency Spectrum Plan Variation 2025 (No. 1)
- C. DRAFT Australian Radiofrequency Spectrum Plan (2025 Update) 2021
- D. Australian Radiofrequency Spectrum Plan (2025 Update) 2021

Defence appreciates the opportunity to provide a response to the consultation on the proposed update to the Australian Radiofrequency Spectrum Plan (ARSP) (Ref A, B). Defence acknowledges the critical role the spectrum plan plays in ensuring Australia's compliance with international obligations and the effective management of electromagnetic spectrum in alignment with national interests.

Defence would like to kindly request considering an inclusion of other formats for the ARSP aside from pdf and word document. In particular, Defence will appreciate if you can provide the Part 2, Table of Frequency Band Allocations, of the ARSP in Microsoft Excel or csv format.

For Defence, it would be useful to be able to provide the ability to manipulate the following data fields:

- Frequency Band (upper and lower limits)
- Service Allocation (PRIMARY/Secondary)
- Footnotes (International/Australian)
- Allocated service

A sample file of a possible format that could be used is provided in Annex A.

In the longer term, it may also be useful to provide a more interactive tool such as the ITU RR5 Table of Frequency Allocation Software.

**Comments on Key Issues Raised in the Consultation Paper:**

**Chapter 1 – General Information**

Defence supports the proposed updates to Section 14, particularly the inclusion of references to the Learmonth Solar Observatory and the Square Kilometre Array's new dual name. These updates ensure accurate representation of national assets in the spectrum plan.

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### Chapter 2 – Part 1: Introductory

Defence endorses the proposed inclusion of a new provision in Section 10 to enable permanent access to frequency bands that are ‘not allocated.’ This provides clarity and ensures consistency in accessing these frequencies without relying on ad hoc approvals under subsection 10(10).

### Chapter 2 – Part 2: Table of Frequency Band Allocations

Defence acknowledges the incorporation of outcomes from WRC-23, particularly the identification of frequency bands for the new allocations for aeronautical and maritime services. These align with Defence's strategic priorities for ensuring resilient and secure communications.

### Decisions Made Under Subsection 10(10)

Defence agrees with the proposal to revoke decisions that are now superseded by permanent arrangements under new footnotes (e.g., AUS107 and AUS108) and international footnotes (e.g., 517B).

### Conclusion(s)

Defence remains committed to ongoing collaboration with the ACMA to ensure that the spectrum plan aligns with both international regulatory frameworks and Australia Government objectives including National Defence Strategy. We appreciate the opportunity to contribute to this consultation process and look forward to further engagement.

My point of contact is Sanjeevan Thanabalasingam on 02 51301800 or via email at [sanjeevan.thanabalasingam@defence.gov.au](mailto:sanjeevan.thanabalasingam@defence.gov.au)

Yours sincerely

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SAMPLE MICROSOFT EXCEL FILE FORMAT

Bands	Allocations	International Foot Note	Australian Foot Note	Conditions/Restrictions
0 - 8.3 KHz		53, 54		(Not allocated)
8.3 - 9 KHz	METEOROLOGICAL AIDS	54A		
9 - 11.3 KHz	METEOROLOGICAL AIDS	54A		
9 - 11.3 KHz	RADIONAVIGATION			
11.3 - 14 KHz	RADIONAVIGATION			
14 - 19.95 KHz	FIXED			
14 - 19.95 KHz	MARITIME MOBILE	56, 57	AUS101	
19.95 - 20.05 KHz	STANDARD FREQUENCY AND TIME SIGNAL			(20 kHz)
20.05 - 70 KHz	FIXED			
20.05 - 70 KHz	MARITIME MOBILE	56, 57	AUS101	
70 - 72 KHz	RADIONAVIGATION	60		
70 - 72 KHz	Fixed			
70 - 72 KHz	Maritime mobile	57		