



TELSTRA GROUP LIMITED

Submission to ACMA Consultation:

Proposed update to the Australian Radiofrequency Spectrum Plan

Implementing the Final Acts of WRC-23

Public Submission

5 December 2024



1 Introduction

We welcome the opportunity to provide our views to the ACMA's consultation on **Proposed update to the Australian Radiofrequency Spectrum Plan (ARSP)**. We have reviewed the proposed changes to parts of the ARSP, and where relevant, the subset of frequencies within a Part that are relevant to our business. Our comments are set out below.

2 Changes to Chapter 1

We have no objection to the proposed amendments to the General Information chapter of the ARSP, of which the most significant changes are some amendments to various solar and radioastronomy observatories in section 14.

3 Changes to Chapter 2

3.1. Changes to Part 1: Introductory

We have no objection to the proposed amendments to Part 1 of the ARSP, of which the most significant change is an amendment to the interpretation of footnote references in the Table of Frequency Band Allocations.

3.2. Changes to Part 2: Table of Frequency Band Allocations

We have reviewed the proposed amendments in Part 2 of the ARSP for bands designated for either mobile services or Point-to-Point links, and we are satisfied that the changes reflect the Final Acts of WRC-23.¹

3.3. Changes to Part 3: Australian Footnotes

We have reviewed this part, and the additional two footnotes are not relevant to our business, and so we offer no comment.

3.4. Changes to Part 4: International Footnotes

We have reviewed the changes in Part 4 of the ARSP for the subset of bands designated for either mobile services or Point-to-Point links, and we are satisfied that the changes reflect the Final Acts of WRC-23. We have not reviewed changes to International Footnotes in bands that are not relevant to our business.

4 Proposed actions for previous decisions made under subsection 10(10)

Subsection 10(10) of the ARSP allows the ACMA to approve the operation of an unspecified service in a frequency band in certain circumstances. Recent examples include changes to allow earth stations (transmitters) in motion (ESIM) in connection with both geostationary and non-geostationary satellites, fixed services in 5600-5650 MHz, and radiodetermination transmitters in selected bands.

¹ WRC-23 Final Acts. Available at <https://www.itu.int/en/publications/ITU-R/pages/publications.aspx?parent=R-ACT-WRC.16-2024&media=electronic>



For seven historic decisions made under subsection 10(10), the ACMA now proposes some actions to “normalise” the behaviour (listed in Table 1 of the consultation paper).

We have no objections to the proposed actions listed in Table 1 of the consultation paper for “normalisation” of the historic decisions made by the ACMA under subsection 10(10).