

Mr. Daniel Gocentas
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Australian Communications and Media Authority
PO Box 78, BELCONNEN ACT 2616



Submitted via the ACMA's website

16 December 2024

Dear Mr. Gocentas

AMTA thanks the ACMA for the opportunity to comment on the draft 2025 update to the Australian Radiofrequency Spectrum Plan (ARSP).

We support:

1. The ACMA's proposed update of Column 1 of the table to align with the changes in the Final Acts of the 2023 World Radiocommunication Conference (WRC-23).
2. The ACMA's proposed update of Column 2 of the table to align with those changes that are relevant to Australia, including changes specific to Australia (where it is explicitly included in a footnote), changes applicable to Region 3 on a regional basis, and changes that apply globally.
3. The introduction of Australian footnotes AUS107 and AUS108, and the clarification that "unspecified services" are permitted in bands which are "Not Allocated" (i.e. 3-420 THz), thereby reducing the need for associated subsection 10(10) decisions.
4. Changes to Part 1, section 13 "Interpretation of the Table" to more clearly and correctly describe the function of Australian footnotes.

As submitted in response to the ACMA's consultation on the update to the *Radiocommunications (Interpretation) Determination 2015* ("the Interpretation Determination"), we wonder whether the ACMA's definition of frequency ranges as "*including the higher, but not the lower, number*" is of any technical relevance in practice.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Coughlan', with a stylized flourish at the end.

Chris Coughlan
Head of Spectrum and Network Infrastructure
Australian Mobile Telecommunications Association Ltd ([AMTA](http://www.amta.org.au))