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The Manager,
Wireless Broadband Section
Australian Communications and Media Authority
PO Box 78
BELCONNEN ACT 2616

Comments on Remaking the Fixed Licence LCD and revised arrangements for the 3.4–4 GHz band

DB Telecommunications Pty Ltd is pleased to be able to offer some comments on the various issues raised in the ACMA's consultation paper.

Question 1

We invite comment on the proposed remake of the Fixed Licence LCD 2015. This includes the following new and amended instruments/policy documents:

- Draft Fixed Licence LCD 2025.
- Draft RRL Amendment Determination.
- Draft updates to RALI FX16.

DB Telecommunications supports the proposed amendments to the above documents.

Question 2

We seek feedback on the proposed licensing and technical arrangements for HL WBB systems. This includes the following new and amended instruments/policy documents:

- Draft updates to RALI MS47.
- Draft new RALI MS50.
- New part 10 of the Fixed Licence LCD 2025.
- Changes to the PMPS licence tax rates in the Tax Determination.
- Draft AWL Amendment LCD.
- Draft RRL Amendment Determination.

DB Telecommunications supports the proposed licensing and technical arrangements for HL WBB systems, including the proposed amendments to the above documents.

Question 3

We seek feedback on the proposed changes to:

- RALI MS47
- the Tax Determination.

DB Telecommunications generally supports the proposed amendments to RALI MS47.

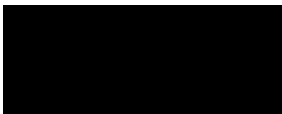
DB Telecommunications does not believe that the provisions for underground systems should be specifically limited to certain use cases, such as mining and rail applications, even though these are the most likely use cases for underground operations. Similarly, it should not be necessary to limit underground operations to certain geographic areas such as remote or regional areas. The fact that spectrum for underground operations cannot be assigned within spectrum designated for spectrum licensing will tend to limit the use of spectrum for underground operations in 3400 – 4000 MHz within metropolitan and regional areas.

Regarding the proposed amendment of the apparatus licence tax determination to accommodate underground operations under a PTS licence, due to the low interference potential of the proposed underground, DB Telecommunications would favour the application of the minimum annual tax for PTS licences that authorise underground operations because of its administrative simplicity.

DB Telecommunications wishes to thank the ACMA for the opportunity to respond to this consultation paper and looks forward to being able to elaborate on the comments made in this submission, if required.

If you would like additional information or wish to discuss any aspect of my submission, please do not hesitate to contact me on [REDACTED] [REDACTED] [REDACTED] or by email [REDACTED].

Yours sincerely,



David Britt
Director