

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

Dear Sir/Madam,

[Airservices comments on the proposed new framework for licensing radionavigation-satellite service retransmission technologies](#)

Airservices Australia (Airservices) is a government-owned organisation that provides facilities and services for the safety, regularity and efficiency of air navigation within Australian-administered airspace. This includes providing air traffic services, aviation rescue firefighting services, aeronautical information, radio navigation and telecommunications services.

In provision of our services to industry, Airservices is reliant on access to RNSS. These services include safety-of-life applications for which harmful interference can have consequences for the safety, regularity and efficiency of civil aviation operations. RNSS retransmission equipment has the potential to interfere with the safe operation of aviation Communications, Navigation and Surveillance systems. Potential effects may include the complete loss or malfunction of one or more of these systems affecting Airservices ability to deliver Air Traffic Services. Furthermore, RNSS retransmission equipment located at aerodromes or along flight paths may affect the operation of aircraft avionics systems.

Under Footnote AUS25 of the Australian Radiofrequency Spectrum Plan 2021, the aeronautical radionavigation service in the band 960–1215 MHz is subject to the provisions of Annex 10 to the Convention on International Civil Aviation and the Standards and Recommended Practices (SARPS) of the International Civil Aviation Organisation (ICAO). Australia is a signatory to the Convention on International Civil Aviation, and it is the expectation of the Australian Government that we comply with the requirements of the ICAO ([Airservices Corporate Plan 2023-24, Appendix A](#)).

The aeronautical radionavigation service (ARNS) is not defined as an aeronautical service in the Australian Radiofrequency Spectrum Plan, and therefore there is no requirement for Airservices to approve these before the ACMA issues a licence. Given the importance of RNSS, and the impact it can have to civil aviation operations, Airservices requests that we are notified when an RNSS retransmission device is licensed in the vicinity of an aerodrome.

Airservices would like to re-iterate to the ACMA our expectations in regard to ACMA's regulation of RNSS retransmission equipment and operation; and its ongoing compliance management to provide assurance that there are no adverse effects to aviation.

Please do not hesitate to contact Matthew Kelly (matthew.kelly@airservicesaustralia.com) and Ritesh Kapoor (ritesh.kapoor@airservicesaustralia.com) should you require any further information.

Yours sincerely

Matthew Kelly
Spectrum Manager

16 June 2004