

Australasian Railway Association

ACMA Submission

Review of the ACMA Consultation
paper: Proposed framework for
long-term licensing of RNSS
retransmission technologies

17 July 2024

ABN: 64 217 302 489



**Australasian
Railway
Association**



The ARA

The Australasian Railway Association (ARA) is the peak body for the rail sector in Australia and New Zealand, and advocates for more than 220 member organisations across the industry.

Our membership covers every aspect of the rail industry, including the:

- passenger and freight operators that keep essential rail services moving;
- track owners, managers, and contractors that deliver a safe and efficient rail infrastructure network; and
- suppliers, manufacturers, and consultants that drive innovation, productivity, and efficiency in the rail industry.

Our members are driven to support vibrant, sustainable and connected communities through greater use of rail across Australia and New Zealand. We bring together industry and government to help achieve this ambition.

Our advocacy is informed by an extensive research program to ensure we offer solutions that are grounded in evidence and focused on delivering tangible value in our daily lives.

The rail industry has a crucial role to play in the region's sustainable development and growth, and offers meaningful and rewarding careers for tens of thousands of people in the regions.

Our significant program of work is focused on supporting a strong advocacy agenda, and creating opportunities for the rail industry to network, collaborate and share information, and maximise the benefits we have to offer the wider community.

The ARA thanks the Australian Communications and Media Authority for the opportunity to make this submission, which has been developed in consultation with ARA member organisations.

Any questions regarding this submission should be directed to Jesse Baker, General Manager Passenger Rail and Safety via jbaker@ara.net.au

Australia's Rail Industry

Rail is a significant industry in Australia, creating economic activity through its operations and capital investments. It is an industry with activities across every major metropolitan and regional area and is supported by the full spectrum of skills in the Australian workforce.

In 2019, the rail industry contributed around \$30 billion to the Australian economy and employed more than 165,000 workers (directly and indirectly in full-time equivalent terms, FTE). The industry is made up of around 900 businesses that are located in approximately 20 major hubs.

Consultation Paper Response

ARA welcomes the invitation to make this submission to the ACMA.

Work related to Radio Navigation-Satellite Services (RNSS) repeater devices (RRD) is of significant interest to rail transport authorities.

ARA supports the ACMA's decision to apply apparatus licences to RNSS RRD and the restriction of RRD to indoor, underground and tunnels. ARA suggests that the restriction includes further clarifications for typical transport locations like a railway shed which often will have an open main door, or where a bridge over the railway effectively forms a tunnel environment even despite not being underground.

ARA supports the application of the European Telecommunications Standards Institute (ETSI) Standard. It is crucial for mobile and safety-critical networks to operate without interference within the same service area as RRD, such as in tunnels. Technical limits provided in ETSI standard are expected to provide sufficient protection against interference caused to other systems. ARA notes the stringent conditions put on specific frequency bands and supports the decision as ARA members are licence holders of 1800 MHz and potentially 1900 MHz in the future.

ARA highlights that the proposed changes to the interference limits for 2 GHz frequency band may create a risk related to the procurement of equipment for transport solutions. Most equipment manufacturers will comply with European ETSI standard, but the proposal deviates from that standard which is likely to require customisation of equipment for Australia's smaller market. This is likely to limit vendor options and potentially increase unit cost.

ARA requests ACMA clarify the frequency of the \$4 renewal charge and whether this is combined with the administrative charges of \$482 at each renewal.