

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



Submitted via the ACMA's website

17 July 2024

Dear Sir/Madam

Introduction

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to provide this submission in response to the consultation paper: *Proposed framework for long-term licensing of radionavigation-satellite service (RNSS) retransmission technologies* ("the consultation paper").

The AMTA is the peak industry body of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians. AMTA's members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

Views on the ACMA's proposals

AMTA supports the ACMA's proposal to facilitate long-term operation of RNSS repeaters under *apparatus-licensing* arrangements, as opposed to class-licensing arrangements. We strongly support the statements made in the third and fourth paragraphs on page 5 of the consultation paper regarding the risks associated with class-licensed RNSS repeaters, as well as the mandated application of the "no interference" condition (section 4.7.1.1 of draft RALI MS 49).

We also support the following views and proposals by the ACMA:

- The proposed exclusion of simulators and pseudolites at this stage, and the limitation to RNSS repeaters that are in indoor, undercover or underground environments only.
- The radiodetermination licence type is most appropriate licence type to authorise RNSS repeaters.
- The proposed modification of Table 3 of ETSI EN 302 645 v1.1.1 such that the more stringent emission limits of -61 dBm and -47 dBm—intended to protect cellular mobile network uplinks and downlinks, respectively—are applied to the 2 GHz band ranges, instead of to the PCS 1900 ranges (which are not relevant in the Australian context).
- We believe that if ETSI imposed these limits on RNSS repeaters with a view to protect cellular mobile networks, then they should be applied accordingly in Australia. Without these, the spurious emission limits falling in spectrum-licensed bands would be -30 dBm/MHz; 21 dB and 7 dB higher on uplink and downlink frequency ranges, respectively.
- That applying the existing licence tax applicable to radiodetermination licences—i.e. based on the product of the base rate in Division 1 of the Apparatus Licence Fee Schedule, for a particular location, frequency range and bandwidth—would be excessive.
 - The ACMA's view that proposed RNSS repeaters would not likely lead to spectrum denial for any other systems (other than other systems that may seek to access the same enclosed, controlled environment) is reasonable.
- The proposed relocation of the definitions for "indoors" and "RNSS radiocommunications" out of the LIPD and RNSS Class Licences (respectively) and into the Interpretation Determination.

However, we also have some requests and recommendations for the ACMA to further refine the licensing arrangements and the corresponding consultative process:

- We welcome further explanation as to why RRD operators are not obliged to conduct coordination as part of the licensing process; as the ACMA notes, the lack of coordination requirements makes the proposed RALI MS 49 different to other RALIs.
- While the justification for proceeding with the proposed framework appears to be the claimed success of trials carried out in NSW and Victoria, we are not aware of any data or outcomes from these trials having been shared with MNOs. Prior to proceeding with the implementation of the apparatus-licensed framework we would appreciate a separate consultative process (e.g. a Tune Up) involving the ACMA, the operators of the trials and MNOs to discuss the setup parameters, results and conclusions of the trials.
- We request that the more stringent emission limit of -61 dBm EIRP be applied to the range 1427-1518 MHz, noting that this band will likely eventually be made available for wireless broadband (WBB) networks.
- Similarly, we request that the more stringent emission limits applicable to the cellular mobile uplinks and downlinks (-61 dBm and -47 dBm respectively) be applied to the respective uplinks and downlinks of the 800 and 900 MHz bands.
- Considering that other services could be allocated in the same frequency ranges allocated to RNSS, we believe that the proposed definition of “RNSS radiocommunication” is too open and needs further refinement. It should add that it is also for the purposes of RNSS.
- We believe that section 4.8 of RALI MS 49 “Notification” lacks clarity; there is no indication as to what constitutes an affected device. Furthermore, we would ask the ACMA to consider whether the notification requirements should be extended from RNSS users to also include MNOs where licensed cellular mobile network infrastructure exists nearby.

Contact

If you have any queries or comments in relation to the content of our submission, please contact Chris Coughlan, Head of Spectrum and Network Infrastructure, 0401 988 322, or by email chris.coughlan@amta.org.au.

Yours sincerely,



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