

Boeing Australia Holdings

Submission to the Australian Communications and Media Authority's Proposed framework for long-term licensing of radionavigation-satellite service (RNSS) retransmission technologies - consultation paper

Boeing Australia Holdings (Boeing Australia) appreciates the opportunity to respond to the Australian Communications and Media Authority's (ACMA) 'Proposed framework for long-term licensing of radionavigation-satellite service (RNSS) retransmission technologies – consultation paper.'

Boeing Australia has an extensive supply chain supporting our advanced manufacturing of commercial aircraft composite components, defence systems design and development, modeling and simulation, research and development, support and training, and uncrewed and autonomous systems.

Boeing Australia employs more than 5,000 people across Australia through a network of subsidiary companies.

Boeing Australia subsidiaries:

- Boeing Aerostructures is Australia's only manufacturer of high-end aero-structure components, providing customers with a complete solution to aircraft component manufacture – from developing the most aerodynamic and efficient design, to rigorous testing processes.
- Boeing Defence Australia is Australia's leading defence aerospace enterprise, supporting some of the largest and most complex programs for the Commonwealth of Australia, the Australian Defence Force – including the Royal Australian Air Force, Australian Army and Royal Australian Navy - and commercial customers.
- Boeing Distribution Australia is a leading solutions provider of aftermarket supply chain management services for the aerospace, defence and marine industries, serving more than 500 customers in Australia.
- Insitu Pacific specialises in the design, development, and manufacture of high-performance and low-cost uncrewed aircraft systems for commercial and military applications.
- Wisk Aero, a leading advanced air mobility company and developer of the first all-electric self-flying air taxi bringing the future of flight to Australia.
- OzRunways, a market leading Electronic Flight Bag (EFB) developer and service provider in Australia and New Zealand and a trusted EFB provider in regions such as South Africa, Latin America and Asia Pacific.
- Jeppesen Australia, providing industry leading innovative electronic informational products, services, and software, supporting business, commercial, government and military, flight planning, crew training, navigation mapping, scheduling and more.



This submission has direct relevance to testing, research and development work of subsidiaries Boeing Defence Australia and Insitu Pacific.

Introduction

The proposal to establish apparatus licensing for GPS repeaters operating effectively in controlled stationary environments at minimal regulatory cost to the user is strongly supported.

Issues and considerations

- Type of Licence

Apparatus licensing for GPS repeaters under circumstances detailed in the draft RALI is supported.

Agreed that apparatus licensing is preferable to a blanket class licence as it enables the regulator to efficiently track devices in the event of any interference and EMC issues.

- Type of device

For the purpose of this consultation it is noted the new apparatus licence framework for GPS repeaters proposes to exclude simulators and pseudolites. Given that such devices need greater regulation and controls than the simple assignment of indoor repeaters it makes good sense to exclude them from this framework.

Simulators and pseudolites can have security and safety implications that need to be managed with engagement of other authorities such as Defence and Airservices Australia.

- Proposed licensing arrangements

- Given the terrestrial transmission of GPS repeaters it is appropriate to align licensing to the Radiocommunications (Interpretation) Determination 2015.
- Identification of GPS repeaters to operate in the RNSS allocations of the ARSP i.e. 1 164–1 215 MHz, 1 215–1 240 MHz, 1 240–1 300 MHz, 1 559–1 610 MHz is essential and supported.

- Draft RALI: MS49 Registration and technical requirements for Radionavigation-Satellite Service (RNSS) Repeater Devices (RRDs)

ACMA is proposing apparatus licensed GPS repeaters to be compliant with ETSI Harmonised Standard EN 302 645. This is an appropriate standard and consistent with other jurisdictions including Ofcom.

However, ACMA is proposing more stringent spurious emissions limits (Table 2 of the draft RALI) to align with the frequency band arrangements for 2 GHz spectrum licences used in Australia. Boeing Australia does not agree that this deviation to the ETSI standard is necessary as the spurious emission levels of EN 302 645 are calculated to prevent harmful interference to other services. As the devices are restricted to indoor, stationary and low power operations the likelihood of interference into 2 GHz spectrum licenced transmissions would be negligible. The framework proposed, especially compliance with the ETSI standard, is straight forward and supports clear regulation.



To introduce an unnecessary complication based only on 'Australian arrangements' adds a level of complexity that is both not warranted and potentially complicating.

- Fees

The ACMA proposal to levy minimal tax and administrative charges is logical given the restricted low power operating environments of GPS repeaters under the proposed framework. This approach supports industry take-up and innovation.

Summary

Boeing Australia commends the ACMA initiative to develop a framework for long-term licensing of radionavigation-satellite service retransmission technologies (GPS repeaters). The framework is consistent with contemporary light touch regulation that supports industry and innovation.

The proposal for the devices to be apparatus licensed and the technical detail of draft RALI: MS49 is supported.

The proposed new taxation and charging structure to accommodate the apparatus licensing at minimal cost to the user enhances application, development and research of these important RNSS technologies.

Boeing Australia does not support the ACMA suggestion of spurious emission limits greater than that stipulated in ETSI standard EN 302 645, and the established ETSI emission levels should be retained for application in Australia.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Neil Meaney', positioned above the printed name.

Neil Meaney

Regional Director Asia-Pacific
Global Spectrum Management
Boeing Australia Holdings

17 July 2024

