

The Manager, Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78, BELCONNEN ACT 2616



Submitted via the ACMA's website

20 June 2025

Dear Mr Jobson

Introduction

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to provide this submission in response to the consultation paper: *Changes to frequency band plans* ("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.

View on the ACMA's proposal

AMTA has no objections to the ACMA's proposal to amend the *Radiocommunications (Mobile-Satellite Service) (1980–2010 MHz and 2170–2200 MHz) Frequency Band Plan 2022* ("the MSS Band Plan") and the *Radiocommunications (Television Outside Broadcasting) (2010–2110 MHz and 2200–2300 MHz) Frequency Band Plan 2022* ("the TOB Band Plan"), to address potential inconsistencies between these band plans and the *Radiocommunications (Low Interference Potential Devices) Class Licence 2015* ("the LIPD CL"), including when it is remade as the 2025 version of this instrument later this year.

We note that the four band plans listed by the ACMA are the only frequency band plans in force:

1. The ACMA believes that the LIPD CL is consistent with the *Radiocommunications (Australian Radio Quiet Zone Western Australia) Frequency Band Plan 2023* ("the ARQZWA Band Plan"); and
2. The other three band plans cover frequencies within the ranges 1427-1535 MHz and 1980-2300 MHz. We agree that there are no provisions within the LIPD CL overlapping these frequency ranges except for the two identified by the ACMA:
 - a) Radiodetermination transmitters in the range 30 MHz to 12.4 GHz; and
 - b) Building material analysis transmitters in the range 2200 MHz to 8500 MHz.

We note that the two items in 2(a) and 2(b) above already exist in the current version of the LIPD CL, and have been in place since August 2019 and May 2016, respectively.

We agree that no amendments need to be made to the *Radiocommunications 1.5 GHz Frequency Band Plan 2015* if it is allowed to sunset on 1 October 2025.

Both the MSS Band Plan and TOB Band Plan already have clauses permitting the operation of radiocommunications devices in accordance with the *Radiocommunications (Science and Research) Class Licence 2023* ("the Science & Research CL") within the relevant frequency bands. The draft *Radiocommunications (Low Interference Potential Devices) Frequency Band Plans Amendment Instrument (No. 1) 2025* ("the amendment instrument") simply copies those clauses, but referring to the re-made (2025) LIPD CL instead of the Science & Research CL.

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,

A handwritten signature in black ink, appearing to read 'C. Coughlan', with a stylized flourish at the end.

Chris Coughlan
Head of Spectrum and Network Infrastructure
Australian Mobile Telecommunications Association Ltd ([AMTA](http://amta.org.au))