

18 June 2025



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

Dear Sir or Madam,

Thank you for the opportunity to comment on the ACMA consultation paper 'Changes to Frequency Band Plans,' published on 7 May, dealing with changes to several spectrum Band Plans, including the *Radiocommunications (Television Outside Broadcasting) (2010-2110 MHz and 2200-2300 MHz) Frequency Band Plan 2022* ('the TOB Band Plan').

The TV industry supports the continuing application of the TOB Band Plan, which establishes strong rights of access to the 2010-2110 MHz and the 2200-2300 MHz bands used by TOB services licensed to the Seven, Nine and Ten TV networks and ABC.

We note the need to amend the TOB Band Plan arises from ACMA's earlier decision to re-make the *Radiocommunications (Low Interference Potential Devices) Class Licence 2015* (the LIPD Class Licence), which will sunset in October.

Two service types authorised by the LIPD Class Licence make use of spectrum covered by the TOB Band Plan:

1. Building Material Analysis Transmitters in the range 2200-8500 MHz;
2. Radiodetermination transmitters using 30 MHz to 12.4 GHz

The proposal appears to be an unavoidable bit of housekeeping with no adverse implications for television outside broadcasting. As the two service types in question have been legal for some time, it is likely any interference issues would have arisen before now.

Thank you again for the opportunity to comment on the proposed changes.

Yours sincerely

Giles Tanner  
Director, Technology Strategy