



TELSTRA GROUP LIMITED

Remaking instruments for the 3.4 GHz spectrum-licensed band

Telstra public submission

29 May 2025

1 Introduction

Telstra welcomes the opportunity to make this submission to the ACMA's consultation on *remaking instruments for 3.4 GHz spectrum-licensed band* (the **consultation**). In this consultation, the ACMA proposes to remake three instruments related to spectrum licensed transmitters and receivers in the 3.4 GHz band:

- The draft *Radiocommunications Advisory Guidelines (Managing Interference from Spectrum Licensed Transmitters — 3.4 GHz Band) 2025* (**draft Tx RAG**);
- The draft *Radiocommunications Advisory Guidelines (Managing Interference to Spectrum Licensed Receivers — 3.4 GHz Band) 2025* (**draft Rx RAG**); and
- The draft *Radiocommunications (Unacceptable Levels of Interference — 3.4 GHz Band) Determination 2025* (**draft ULol**).

We support the remaking of all three instruments, as they form a vital part of rules for coordinating with spectrum licensed transmitters and receivers in the 3.4 GHz band.

As part of remaking the three instruments, the ACMA proposes some changes to the instruments. Reasons for the changes include: 1) adopting the now common instrument structure (first adopted for the 2.3 GHz band technical framework) to ensure consistency between different bands; and 2) introducing new arrangements, such as changes for the highly localised wireless broadband (HL-WBB) services that operate in the band. Overall, we support the introduction of these changes

However, we have identified some errors in the drafting, and we have some questions regarding other changes in two of the three instruments. As such, our submission is structured as follows:

- **Section 2** contains our comments on the draft Tx RAG;
- **Section 3** contains our comments on the draft Rx RAG; and
- **Section 4** contains our comments on the draft ULol.

2 Transmitter RAG

This section contains our comments on the draft Tx RAG.

2.1 Notes related to FSS facility in Uralla (Part 10)

The ACMA has removed the following two notes from Part 10:

| | |
|---------|---|
| Note 1: | Given some of the services operating at the Uralla facility are temporal in nature and/or may only track certain parts of the sky, there may be opportunity for detailed negotiations between licensees to manage interference while improving spectrum utilisation. |
| Note 2: | The long-term viability of the Uralla facility may be reviewed in the future. This is in light of the increasing demand for fixed and mobile broadband capacity, growing international interest in the 3400–4200 MHz band for use by fixed and mobile wireless broadband services and the proximity of the site to major regional population centres. However, if it is shown that fixed and mobile broadband service deployments in nearby major towns are not unreasonably restricted (noting there is likely to be some restrictions), this would be taken into consideration when assessing the long term viability of the Uralla facility. |

These notes are of importance to the mobile industry, insofar as they set expectations that mobile deployments in and around the Uralla ESPZ should be considered. The consultation paper does not

explain why the notes have been removed from the draft 2025 version. We would appreciate the notes being reinstated, or at a minimum, an explanation should be provided by the ACMA for their removal.

2.2 AMTA submission

The Australian Mobile Telecommunications Association (**AMTA**) submission goes into further detail on some elements of the Tx RAG. We agree with, and support AMTA's comments, as described in their submission.

3 Receiver RAG

This section contains our comments on the draft Rx RAG.

3.1 Align notional receiver performance requirements in Schedule 1 to 3GPP

We welcome the changes to Schedule 1, which bring the structure of this schedule into alignment with other Rx RAGs for other bands.

Remaking a sunset instrument is a good juncture to ensure the instrument aligns with the latest version of 3GPP international standards. We observe, however, that this has not occurred in this instance, but instead, the ACMA has “uplifted” existing values for notional receiver performance level, adjacent channel selectivity, intermodulation response rejection and receiver blocking capability.

AMTA's submission to this consultation goes into greater detail, and we request the ACMA make the changes to Schedule 1 of the Rx RAG, as proposed in AMTA's submission to this consultation.

3.2 Typographical errors in Schedule 1

As the ACMA notes in the consultation paper, some of the changes proposed in the Draft 2025 version of the Rx RAG are to align with other Rx RAGs for other bands, such as the 2.3 GHz band. In aligning with other bands, there seems to be some copy-and-paste sections that have not been aligned to the 3.4 GHz band, for example in section 4 of Schedule 1.

4 Unacceptable Levels of Interference

4.1 Exception for DBCs in clause 7(5).

Following correspondence between AMTA and the ACMA, we understand the scenario the ACMA is trying to accommodate through the addition of clause 7(5)(d)(ii). We have no objection to the introduction of this clause. We consider it would have been helpful of the ACMA to provide an explanation for this addition in the consultation paper.