

Australasian Railway Association

# ACMA Submission

Remaking the low interference  
potential devices class licence

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16 May 2025

ABN: 64 217 302 489



# The ARA

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The Australasian Railway Association (ARA) is the peak body for the rail sector in Australia and New Zealand, and advocates for more than 220 member organisations across the industry.

Our membership covers every aspect of the rail industry, including the:

- passenger and freight operators that keep essential rail services moving;
- track owners, managers, and contractors that deliver a safe and efficient rail infrastructure network; and
- suppliers, manufacturers, and consultants that drive innovation, productivity, and efficiency in the rail industry.

Our members are driven to support vibrant, sustainable and connected communities through greater use of rail across Australia and New Zealand. We bring together industry and government to help achieve this ambition.

Our advocacy is informed by an extensive research program to ensure we offer solutions that are grounded in evidence and focused on delivering tangible value in our daily lives.

The rail industry has a crucial role to play in the region's sustainable development and growth, and offers meaningful and rewarding careers for tens of thousands of people in the regions.

Our significant program of work is focused on supporting a strong advocacy agenda, and creating opportunities for the rail industry to network, collaborate and share information, and maximise the benefits we have to offer the wider community.

The ARA thanks the Australian Communications and Media Authority for the opportunity to make this submission, which has been developed in consultation with ARA member organisations.

Any questions regarding this submission should be directed to Jesse Baker, General Manager Passenger Rail and Safety via [jbaker@ara.net.au](mailto:jbaker@ara.net.au)

# Australia's Rail Industry

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Rail is a significant industry in Australia, creating economic activity through its operations and capital investments. It is an industry with activities across every major metropolitan and regional area and is supported by the full spectrum of skills in the Australian workforce.

In 2019, the rail industry contributed around \$30 billion to the Australian economy and employed more than 165,000 workers (directly and indirectly in full-time equivalent terms, FTE). The industry is made up of around 900 businesses that are located in approximately 20 major hubs.

# Railway response

The ARA supports the ACMA activity to review and update the remaking the low interference potential devices class licence with this instrument to:

- Improve readability
- Update reference
- Removal of unused exceptions to limitation that have not been used that are specific for potential interference to radioastronomy and space research
- Addition of arrangements to enable alignment with ETSI standards and international practice
- Implement ACMA decisions since the last review

The ARA had comment on the following changes:

## 1. Removal of limitations from Item 45 of Schedule 1 to the LIPD class licence (Table 5, item 4 in the proposed new class licence

We note that the above removal is justified by the standard referred in part (a) of the limitation to not being freely available. However, we note that all the other limitations, parts (b), (c) and (d), have also been removed. These parts do not refer to any standard. What is the rationale for removing the other parts of the limitation?

The ARA suggests the following additional changes:

## Provide commentary and guidance in Explanatory Statement on use of the LIPD Class Licence for operational applications that can have a safety impact

Previous notes provided caution to users of LIPD class licences noting it is shared spectrum; useful for short distances; limited radiated power levels; uncoordinated; and care should be given to use for safety-of-life applications.

Specifically, ARA would like these notes from LIPD 2000 to be restored by inclusion in LIPD Explanatory Statement.

Notes from LIPD 2000	Recommended action	ARA View
<p>Devices supported under this Class Licence are typically used for communications over short distances.</p> <p>By placing appropriate limits on parameters such as device type, radiated power levels and frequencies of operation, the interference potential of a low interference potential device (LIPD) may be held to a sufficiently low level that enables sharing the spectrum with other radiocommunications devices on an uncoordinated basis in most circumstances.</p>	<p>Restore note and recommending apparatus or spectrum licenses for applications requiring some certainty over access to spectrum and specific interference expectations.</p> <p>Perhaps some mentioning of risk of unquantifiable and uncoordinated interference from the legal use of LIPD transmitters by others.</p>	<p>This reminds users what limitations exist and what kind of applications were expected for LIPD: short-local, shared, and uncoordinated.</p>

<p>LIPDs are sometimes used for radio applications with commercial or safety--of--life implications.</p> <p>Users of such applications are encouraged to have particular regard to the suitability of operating under this Class Licence for their radiocommunications needs.</p>	<p>Restore note and possibly mentioning some example applications such as</p> <ul style="list-style-type: none"> <li>* Revoking a movement authority in a transportation application</li> <li>* Remotely commanding a vehicle</li> <li>* Communicating a signal status</li> <li>* Moving or halting a crane or jack</li> </ul>	<p>This warns users that systems requiring timely transmission for safety should consider more appropriate spectrum licences.</p>
<p>Manufacturers and suppliers of radiocommunications products able to be supported under this Class Licence are encouraged to have regard to the information in this note when forming advice about the suitability of their products for the intended application of the products by customers.</p>	<p>Restore note</p>	<p>This note asks manufacturers and suppliers to pay attention to these notes and wisdom they contain.</p>