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The Manager
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16th May 2025

To Whom It May Concern,

Thank you for the opportunity to comment on the *Remaking the low interference potential devices class license* consultation.

The Australian Music Association is the industry body representing wholesalers, importers, manufacturers, retailers, and associated businesses for music products in Australia. Established in 1977, the AMA has a strong history of supporting and advocating for the music products industry and contributing to the development of musical life in Australia.

We represent the music products industry, which is worth over \$1 billion. The music products industry includes businesses that develop, make, distribute, sell and repair musical instruments, professional audio equipment, accessories, music technology, print music and related products.

Industry Context and Wireless Audio Implications

Wireless audio devices are widely used in live performance, corporate events, weddings, churches, educational institutions, sporting events, tv and film production, and other applications. These devices are now embedded and play a key role in many different production environments, including in multi-billion dollar live music sector which relates to our members' interests.

Research conducted by the University of Tasmania and Live Music Office in 2015 found that the live music sector contributed \$15.7 billion of value to the Australian economy.¹ Live Performance Australia's Ticket Attendance and Revenue Report 2023 recorded \$3.1 billion in total revenue, with live music being the largest market share for revenue (47.4%) and musical theatre being the second largest (17.3%).² Wireless audio devices are widely used across the whole sector and these formats in particular.

Prevalence of Wireless Audio Devices

The AMA monitors imports and exports of professional audio equipment, musical instruments and related products for its Market Report, based on customs data from the Australian Bureau of Statistics.

¹ <https://livemusicoffice.com.au/research/>

² <https://reports.liveperformance.com.au/ticket-survey-2023/index.html#/>

The AMA analyses and produces summaries of each relevant import category.

We are not able to estimate the total number of wireless audio devices because some are imported under categories that do not separate wireless from other devices, such as guitar wireless systems or in-ear monitors. We do, however, have a reliable data source for wireless microphones (HSITC code .

Overview of Wireless Microphone Imports

Calendar Year 2024

	Vs previous year	Vs 5 year Average	Vs 10 Year Average
Total Units	9.8%	17.7%	58.7%
Total Value	-3.0%	17.7%	33.5%
AUV	-11.7%	-1.6%	-26.3%

In the 10 years since the last LIPD license was created, the use of wireless microphones has increased substantially. Imports in 2024 reached a new record high, and have remained relatively stable for four years which is unlike the result in related categories. Almost two million units were imported over 10 years, this figure excludes local manufacturing which we cannot report at this level of detail (wireless microphones) but would take the total in the market to well over 2 million units in a decade. The pattern in this category is a substantial increase in units from 2020 to 2021, and a reduction in average unit costs in the past decade.

Wireless Microphone Imports

	Units	Value
2024	310344	18313506
2023	282614	18878069
2022	308183	16571137
2021	283580	15091428
2020	134037	8970124
2019	158390	10485315
2018	158184	10788008
2017	127792	10446717
2016	86407	11335933
2015	106081	16282027

The substantial increase in wireless audio devices such as microphones underscores the need to maintain the available spectrum, and to encourage more efficient new technology including WMAS.

Responding to the Draft Radiocommunications (Low Interference Potential Devices) Class License 2025

The AMA welcomes the ACMA's consultation on the remaking of the LIPD Class License and supports the minor changes made in this proposal.

We agree with ACMA's preliminary view that the LIPD class licence is operating effectively and efficiently and welcome the decision to make only minor changes, and to facilitate the use of emerging technologies.

The proposed new LIPD license class maintains much of the existing license, due to sunset in October 2025, with several clarifications and additions.

WMAS

We support the change to specifically authorise Wireless Multichannel Audio Systems (WMAS) within the 520-694MHz frequency range under the LIPD class licence.

We note that ACMA's preference, following the 2022 consultation, is to maintain existing power limit of 100 mW and authorise the use of bandwidths of up to 20 MHz. The power limit is consistent with feedback in the 2022 consultation,³ and the more recent regulation set by the US FCC for unlicensed use of WMAS.⁴ Our industry supports this policy setting rather than constraining a single use of WMAS to a single TV channel. The efficiency potential of WMAS technology requires flexibility in the use of bandwidth.

The decision not to include a minimum spectral efficiency limitation is consistent with the standard EN 300 422-1, and supports efficiency value being a design objective rather than a regulated limit.

Standards

We support referencing EN 300 422-1 as the appropriate reference standard.

Definition of Indoors

The Outcomes Paper for ACMA's 2022 consultation on the LIPD license class found that "some submitters were concerned that the proposed wording failed to capture some locations and situations that they believe should be, or are intended to be, considered 'indoors', which may overly restrict deployment of devices or inadvertently invalidate some existing uses...Some of these submitters simply suggested re-thinking the wording of the definition, or leaving the class licence as is, without a specific definition." ACMA signalled an intention not to cover "vehicles, uncovered areas within larger structures (such as the playing area in open-air sports stadiums), or temporary installations" in the definition of 'indoors'.

As it applies to live performance and other events, there may still be confusion about what exactly constitutes 'indoors', for example:

- A temporary marquee or structure,
- a semi-permanent structure that effectively looks and functions like an 'indoor' space without having a permanent floor or walls, and
- events with a combination of indoor and outdoor spaces.

We are not proposing any changes to the license but note that ACMA should consider the potential for confusion over the meaning of 'indoor' while this license is being implemented.

Regards,



Alex Masso

Executive Officer

Australian Music Association

³ <https://www.acma.gov.au/consultations/2022-10/new-arrangements-low-interference-potential-devices-consultation-352022#submissions>

⁴ https://www.fcc.gov/sites/default/files/31-EMC-Updates-TCB_Apr_2024.pdf

