



16 May 2025

Ms Nerida O’Laughlin
Chair
The Australian Communications and Media Authority
Via: www.acma.gov.au/consultation

Dear Ms O’Loughlin

The ACMA remaking of the Low Impact Potential Device licence 2025

Thank you for the opportunity to respond to the consultation on the Remaking of the Low Impact Potential Device (**LIPD**) Licence 2025.

Ericsson welcomes the opportunity to respond and acknowledges the **ACMA**’s willingness to engage with industry on this matter. Ericsson supports the Australian Mobile Telecommunications Association’s (**AMTA**) submission on this consultation also.

Ericsson notes that a key outcome of the remaking of the **LIPD** class licence will be to allow the use of WiFi devices in the range 6425-6585 MHz, giving effect to the **ACMA**’s late-2024 decision regarding the future use of the Upper 6 GHz band.

As outlined in Ericsson’s recent submission to the **ACMA**’s draft FYSO 2025-30, it is Ericsson’s strong view that the **ACMA** should delay licensing Radio Local Area Network (**RLAN**) in the Upper 6 GHz band until adjacent channel coexistence between **RLAN** and International Mobile Telecommunications (**IMT**) is resolved.

Doing so, avoids establishing a position that would be practically impossible to reverse should further information emerge regarding the viability of co-existence.

Accordingly, Ericsson recommends that the **ACMA** give effect to its late 2024 decision on the future use of the Upper 6 GHz by implementing the allocation of **RLAN** and **IMT** at the same time – that is, a harmonised timeline for implementation. This approach would enable all technical issues including Point-to-Point, **RLAN** and **IMT** technologies to be considered holistically.

Importantly this would also allow for the current European considerations regarding the use of the band – including a potential frequency separation and co-existence – to be defined, and in turn, settled. Noting the likely complexity of coexistence of **RLAN** and **IMT** within the band, we urge **ACMA** to inform itself fully about likely impacts before proceeding further to ensure this spectrum can be used most efficiently.

In terms of a timeline for technical information about coexistence, we note that while this work is being undertaken in Europe, it is not scheduled for completion for some time. Presently, the Upper 6 GHz band is being studied following the European Commission’s (**EC**) *Mandate to the European Conference of Postal and Telecommunications Administrators (CEPT) to study the feasibility of and develop least restrictive harmonised technical conditions for the provision of wireless broadband by terrestrial systems capable of providing wireless broadband electronic*



communications services and by wireless access systems, including Radio Local Area Networks (**Mandate**).¹ The **Mandate** specifies three tasks to be performed by CEPT, in particular Electronic Communications Committee (ECC) CEPT Working Group 1 (**PT1**) is required to undertake:

Task 1: study and assessment of coexistence and compatibility of:

- terrestrial systems capable of providing **WBB** Electronic Communications Services (**ECS**) with incumbent spectrum users;
- Wireless Access Services (**WAS**)/**RLANs** with incumbent spectrum users, with delivery date March 2026.

Task 2: study of feasibility and scenarios for the potential shared use between terrestrial systems capable of providing **WBB ECS** and **WAS/RLANs**, with delivery date July (or November) 2026.

Task 3: development of harmonised technical conditions, with delivery date July 2027.

The **Mandate** requires the **CEPT** to collaborate actively with all relevant stakeholders, including the Radio Spectrum Policy Group (**RSPG**) and European Telecommunications Standards Institute (**ETSI**). The **RSPG**, which is an advisory group to the **EC**, is in parallel, working on a “[l]ong-term vision for the upper 6 GHz band”. A Draft Opinion for Public consultation was scheduled for February 2025, but delivery has been delayed and a draft opinion has not yet been released.

These timelines suggest to us that the critical technical information, including potential adjacent band co-existence within the upper 6 GHz band, will not be available for some time. In our view, Australia will benefit substantially from aligning with global developments in relation to the Upper 6 GHz band and therefore, Australia should avoid constraining itself to decisions which may result in devices entering use in Australia which could not be reversed if **CEPT** finds co-existence concerns in their studies leaving Australia’s position unique compared to the rest of the world.

We note that the United Kingdom (**UK**) **OFCOM** has recently released a consultation on the use of the Upper 6 GHz band also. Aligned with our recommendation to **ACMA**, Ericsson strongly recommends the **UK** follows and adopts the **CEPT** process, and thus not pre-authorizing any unlicensed usage in the upper 6 GHz band before a holistic technical solution for the band is agreed. For reference, a copy of Ericsson’s submission to the **OFCOM** consultation is attached (Appendix One, Commercial-in-Confidence).

Finally, we also believe that the impact on Point-to-Point links from **RLAN** devices has not been investigated and determined. Unlike **IMT** which needs to co-ordinate with **PTP** links, **RLAN** can operate in any location and has been shown in European studies to cause interference to **PTP** links as Ericsson previously indicated in its June submission on the future use of the Upper 6GHz submission (pp 11).^{2 3}

In sum, Ericsson believes the remaking of the Low Impact Potential Device licence 2025 can occur without including **RLAN** in the frequency range 6425 – 6585 MHz, thereby not impacting

¹ CEPT, 2024, [Mandate to CEPT upper 6 GHz band](#)

² CEPT, 2023. https://api.cept.org/documents/se-45/78519/se45-23-info006_info-document-on-rlan-vs-fs-field-measurements

³ See also:

https://cept.org/documents/se-45/78519/se45-23-info006_info-document-on-rlan-vs-fs-field-measurements

https://cept.org/documents/se-45/84104/se45-24-057a1_measurements-analysing-the-interference-effect-of-a-rlan-ap-to-a-fs-link-at-6-ghz

https://cept.org/documents/se-45/78474/se45-23-035_rlan-vs-fs-interference-measurements



other devices. In our view, RLAN devices can then be included in a future remaking of the LIPD licence, once more information is available on the appropriate adjacent coexistence measures.

Yours sincerely

Sebastian Zwalf

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Australia and New Zealand



Commercial-in-Confidence begins

Appendix One: Ericsson response to Ofcom consultation on Expanding access to the 6 GHz band for mobile and Wi-Fi services

Note that the contents of the following are specific to the United Kingdom and should be considered in that context.