

**THE MANAGER
SPECTRUM PLANNING SECTION
AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY
PO BOX 78
BELCONNEN ACT 2616**

Friday, 16 May 2025

Dear ACMA Consultation Team,

RE: Response to ACMA Consultation on Remaking the Low Interference Potential Devices Class Licence

I am writing to provide feedback on the proposed changes to the Low Interference Potential Devices (LIPD) Class License, specifically concerning the ISM band and its impact on UHF RFID technology.

About InfraBuild ([About - InfraBuild](#)):

We recycle, manufacture, and distribute steel long products. We are Australia's only fully vertically integrated steel manufacturer spanning scrap metal recycling, steel manufacturing and downstream distribution.

We have an integrated steelmaking and manufacturing network, comprising two Steelworks producing long product steel utilising Electric Arc Furnaces (in Rooty Hill, Sydney; and Laverton, in Melbourne); and eight product manufacturing mills (Bar, Rod, Rolling, Tubular and Wire) in Laverton, Geelong, Rooty Hill, Newcastle and Brisbane.

We have a proud history of more than one hundred years of continuous manufacturing of quality steel product in Australia.

About the Author ([37](#)) [David McNeil](#) | [LinkedIn](#)

David McNeil, Customer Experience Manager for InfraBuild Steel, has over 45 years' experience in the manufacture, sale, and distribution of steel products in the Australasian market. As a result, he has developed a deep understanding of the complexities and challenges in serving customers across the geographically dispersed Australian and New Zealand markets.

The essence of David's role is about combining people, data, and systems to make it easier for people to do business. Initiatives have covered a wide spectrum, from customer self-

service platforms through to full B2B integrations; this has included the rollout of standard product identification tags for InfraBuild Manufacturing utilising GS1's 1D & 2D symbology and RFID standards to further unlock supply chain efficiencies and improved product traceability.

David's recent focus has been on expanding the digitisation of InfraBuild's products and services, including unique identification of InfraBuild Mill Test Certificates. The importance of digital linkage of product to certification has been recognised globally through the recent publication by the United Nations Economic Commission for Europe (UNECE) of Recommendation No. 49: Transparency at Scale.

As Co-Chair of the National GS1 Traceability Advisory Group (NGTAG) and as a committee member of Standards Australia Technical Committee IT-034 Automatic Identification and Data Capture Techniques David works to support the enhancement of supply chain traceability in Australia. This work helps to maintain and build global competitiveness, sustainable economic growth, and a positive socio-economic outcome.

UHF RFID Technology and InfraBuild Manufacturing: At our steel plant in western Sydney, we are currently trialling the use of UHF RFID technology to identify and track our hot-rolled steel.

Having the ability to uniquely identify and track our products is integral to the industry sectors that we serve including construction, mining, and manufacturing.

The use of UHF RFID product tags enables efficient and accurate tracking of inventory and facilitates our endeavours with customers to use this technology to unlock productivity, safety, and quality improvements and to reduce waste.

Ensuring that the regulatory framework supports the continued growth and innovation in UHF RFID applications is vital for these industries.

Proposed Changes

As a manufacturing business wanting to employ UHF RFID technology to enhance its services, continuity and integrity of the UHF RFID spectrum and the associated power limits, are critical to our industry to have confidence in adopting and promoting this technology.

Therefore, I would ask that ACMA consider the following points:

- **Frequency Allocation:** The narrow ACMA 6 MHz bandwidth currently available for UHF RFID limits its use in dense deployments. To fully realize the potential of UHF RFID, an ideal channel bandwidth of around 10 MHz is recommended.

- **Power Limits:** Increasing power limits for UHF RFID devices operating in the ISM band requires further review. The industry requests more power to solve challenging RFID applications involving metals and liquids. Maintaining optimal power levels for specific applications is crucial for the reliable performance of UHF RFID systems. The European Union (ETSI) regulation allows for 4W ERP (equivalent to 38.15 dBm EIRP), while Australia is still under 4W EIRP (equivalent to 33.75 dBm ERP). There is a need to align the power levels to new standards.

Emerging RFID Use Cases: Recent advancements in RFID technology have introduced new use cases that require more power and bandwidth, such as:

- **Sensor Tags:** These tags integrate sensors to monitor environmental conditions like temperature, humidity, and motion. They require higher power levels to transmit sensor data reliably and efficiently.
- **Real-Time Location Systems (RTLS):** RTLS applications use RFID technology to provide continuous, real-time tracking of assets and personnel within defined spaces. These systems often require increased bandwidth and power to ensure accurate and timely location updates.

Recommendations: To address the concerns mentioned above, I recommend the following actions:

- **Stakeholder Engagement:** Foster continuous dialogue with industry experts, manufacturers, and users of UHF RFID technology to ensure the regulatory framework meets the market's needs and expectations. I am willing to lead this facilitation on behalf of the broader industry.

Conclusion: The review of the LIPD Class License for the ISM band is a critical step in ensuring the continued success and growth of UHF RFID technology. By carefully considering the implications of the proposed changes and engaging with stakeholders, ACMA can create a regulatory environment that fosters innovation while maintaining the integrity of existing systems.

Thank you for the opportunity to provide feedback on this important matter. We look forward to the positive outcomes of this consultation process.

Yours sincerely,

DAVID MCNEIL
Customer Experience Manager