

ONLINE SUBMISSION

15 May 2025

The Manager
Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Re: Remaking the low interference potential devices (LIPD) class licence

Intelsat, the leading provider of fixed-satellite services ("FSS") worldwide¹, is pleased to submit feedback on the consultation paper on *Remaking the low interference potential devices class licence* published by the ACMA in March 2025.

Radiodetermination radiocommunications transmitters in the 13.4–14 GHz band

Intelsat understands from the consultation paper that the ACMA is proposing to introduce into the LIPD class licence arrangements that will allow radiodetermination transmitters in the 13.4-14 GHz band to operate with a maximum EIRP of 25 mW in line with ETSI EN 300 440, with a restriction on the use of the devices onboard aircraft. In Part 9 'Radiocommunications transmitters used in sensors using radar for measurement (radiodetermination)' of the draft Radiocommunications (Low Interference Potential Devices) Class Licence 2025, the maximum EIRP is set at 500 mW which is not compliant with requirements in EN 300 440. It is suggested that the maximum EIRP in the class licence should be 25 mW in line with ETSI EN 300 440.

Intelsat stands ready to provide additional information if required.

Respectfully submitted,



Mohaned Juwad
Director, Spectrum Policy

¹ For the past 50 years, Intelsat has been delivering information and entertainment for many of the world's leading media and network companies, multinational corporations, Internet Service Providers and governmental agencies, among many users. Intelsat Asia Carrier Services, LLC, a subsidiary of Intelsat US LLC, holds an Australian carrier licence under subsection 56(1) of the Telecommunications Act 1997.