

JEITA Proposals on the Remaking the low interference potential devices class licence 2025

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To whom it may concern

We, the Japan Electronics and Information Technology Industries Association (JEITA), are the leading Japanese association that consists of more than 390 manufacturers, suppliers and service providers for the electronics and information technology sector.

Regarding the Remaking the low interference potential devices class licence 2025, we would like to submit the following comment on the proposed amendments to the frequency hopping radiocommunications transmitters in the 5925–6425 MHz band in Australia.

Out of band emissions limits on below 5925 MHz

Concern: For the newly added item 5 of Table 8 in LIPD class licence 2025, (narrowband) frequency hopping radiocommunications transmitters in the 5925–6425 MHz band (hereinafter referred to as “NB (NarrowBand) devices”), an out of band emissions (OOBE) limit of -45 dBm/MHz below 5925 MHz is proposed, while that for the existing item 14 of Table 8, RLAN radiocommunications transmitters 5925–6585 MHz (hereinafter referred to as “VLP (Very Low Power) devices”), is -37 dBm/MHz.

Since an NB device is one of VLP devices, the OOBE limits for both devices should be the same.

Meanwhile, the relaxation of the OOBE limits for VLP devices (including NB devices) from -45 dBm/MHz to -37 dBm/MHz is being considered in the European Commission (WTO/TBT notification G/TBT/N/EU/768/Add.2).

< <https://web.wtcenter.org.tw/downloadFiles/13317/408898/004aIU09XvkFTbEFLhzukjxZUKAAD8eoB9HikKwbngVaZNmvxX11111OoEGeVvB9h8zGKZyuB1VhD2ezqGRgY8yM58pQ==> >

Therefore, the OOBE limit of -37 dBm/MHz should be applied to not only VLP devices but also NB devices.

<Current text in clause 42 referred from item 5 of Table 8>

“(4) A radiocommunications transmitter must not be operated if its EIRP measured below 5925 MHz is greater than -45 dBm per 1 MHz.”

Proposal: For item 5 of Table 8, the OOBE limit should be changed from -45 dBm/MHz to -37 dBm/MHz.

<Proposed new text>

“(4) A radiocommunications transmitter must not be operated if its EIRP measured below 5925 MHz is greater than -37 dBm per 1 MHz.”

We are looking forward to having your kind consideration and a favourable response to our above proposal.

With kind regards,
Yours sincerely,

May 16, 2025

A handwritten signature in black ink, appearing to read 'K. Hori', with a stylized flourish at the end.

Kazuyuki Hori
Chair of JEITA Radio Regulations Expert Committee

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