

12 May 2025

Jands, as the Australian distributor of Shure, welcomes the opportunity to provide comments on the ACMA's remaking of the Radiocommunications (Low Interference Potential Devices) Class Licence 2025.

We commend the ACMA for its proactive approach in modernizing the LIPD Class Licence to better accommodate the evolving needs of the PMSE (*Programme Making and Special Events*) industry.

Comment to **"Wireless multi-channel audio system (WMAS) technologies for wireless audio transmitters"**:

We wish to acknowledge the ACMA's forward-looking decisions in the area of WMAS technologies.

The decision not to mandate that WMAS emissions fall entirely within a single TV channel is appreciated. This approach provides necessary operational flexibility, enabling users to make the most efficient use of the available spectrum.

Similarly, the choice to not impose a minimum spectral efficiency requirement allows manufacturers to develop products that can best serve the requirements of the PMSE industry. We do, however, acknowledge that this freedom does introduce a potential risk of spectrum inefficiency or abuse, which highlights the increasing need for responsible frequency management.

The inclusion of WMAS bandwidth allowances up to 20 MHz is a significant choice and ensures Australian users can benefit from the latest technological advancements delivered by manufacturers. We note, however, that in the absence of a mandated spectral efficiency threshold, there remains a theoretical risk of inefficient spectrum use (e.g., the operation of a single audio channel across 20 MHz). Despite this, we support the ACMA's position in allowing users to manage their spectrum use responsibly within the constraints of the Class Licence framework.

We appreciate the ACMA's recognition of WMAS technology as a key enabler for efficient and "future-proof" (or as future-proof as anything can be) wireless audio solutions and support the ongoing harmonization of these regulations with other regulation bodies.

Respectfully submitted,

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