

**Submission in response to ACMA Consultation Paper  
on remaking the low interference potential devices  
class licence**

**NBN Co**

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## Introduction

nbn welcomes the opportunity to respond to the ACMA's consultation paper on remaking the low interference potential devices (**LIPD**) class licence (**Consultation Paper**).

nbn was established in 2009 as a Government Business Enterprise, to provide fast, reliable and affordable connectivity and to enable Australia to seize the economic opportunities before it and service the best interests of consumers. It remains the principal responsibility of nbn to operate and continue to build and upgrade the nbn network in accordance with the expectations of the Government, a set out in the Shareholder Ministers' Statement of Expectations (SoE). As of March 2025, 8.63 million homes and businesses are connected to the nbn network, with 12.54 million premises able to connect.

The LIPD class licence authorises the operation of a wide range of generally low-power radiocommunications transmitters in various segments of the radiofrequency spectrum. Of particular significance to nbn is the authorisation of wireless local area network devices, including Wi-Fi.

nbn supports the ACMA's preliminary view that the LIPD class licence is generally operating effectively and efficiently and continues to play a necessary role in the radiocommunications regulatory framework. We therefore support the proposal to remake the LIPD class licence with only minor changes prior to the sunset date, including the introduction of new arrangements to facilitate the use of emerging technologies.

nbn's comments on the proposal to remake the class licence are limited to the frequency range for RLAN use.

## RLAN radiocommunications transmitters in the 6425–6585 MHz band

In its Outcomes Paper on Future use of the upper 6 GHz band, the ACMA outlined its decisions related to future arrangements for the upper 6 GHz band, which included a commitment to include the frequency range 6425–6585 MHz in the LIPD class licence to support RLAN use. To implement this decision, the Consultation Paper proposes to increase the upper bound of items 63AA and 63AB in Schedule 1 to the LIPD class licence to 6585 MHz, when the licence is remade. nbn supports this proposal.

Reliable and high performing Wi-Fi is an important aspect of the in-premise networks through which customers access the nbn network. As noted by the ACMA in the Draft FYSO 2023-28, "RLAN technology, specifically wi-fi, has become an integral part of everyday modern life and wi-fi use continues to expand, with more diverse devices using these networks". It is important for the ACMA to ensure adequate spectrum is available to accommodate next generation Wi-Fi devices and to allow for the increasing traffic being carried over Wi-Fi networks.

nbn also supports ongoing consideration of the potential to permit higher power/EIRP RLAN use, as flagged in the Draft FYSO 2025-30. We understand that the ACMA proposes to consult separately in relation to this. As we have previously noted, any power increases proposed for RLAN would need to be supported by robust and suitable modelling to ensure it doesn't

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introduce interference to nbn's widely deployed point-to-point links in the 6 GHz band. However, in principle, if the relevant studies are completed to demonstrate no increase to aggregate interference, nbn welcome the assessment of AFC for standard power and exploration of the outdoor/indoor split as perhaps a less burdensome approach to enabling 'standard power' for RLANs indoors.

We understand that Australian Mobile Telecommunications Association (**AMTA**) has urged a pause on allocating the 6425–6585MHz band for Wi-Fi use, calling instead for coexistence studies to be completed and for consideration of regulatory decisions by major global economies on the upper 6GHz band. However, we note that the United States, Canada, South Korea and a number of South American countries have already allocated the entire band for RLAN use.

For completeness, we note that nbn does not support the allocation of the rest of the upper 6 GHz spectrum to WA WBB. There is a long-term requirement to support ever faster in home experiences and we believe more evidence is needed to determine the quantum of spectrum that may be needed for WIFI/RLANs in the future.