



Submission in response to
ACMA Consultation Paper

**Remaking the low
interference potential
devices class licence**

Public Version

May 2025

OPTUS FEEDBACK

1. Optus welcomes the opportunity to provide feedback to the Australian Communications and Media Authority (ACMA) consultation paper on *Remaking the low interference potential devices class licence*.
2. The Radiocommunications (Low Interference Potential Devices) Class Licence 2015 (LIPD Class Licence) authorises the use of a wide range of generally low-power radiocommunications transmitters in various segments of the radiofrequency spectrum. This is due to sunset on 1 October 2025.
3. The draft Radiocommunications (Low Interference Potential Devices) Class Licence 2025 maintains the operation and effect of the LIPD Class Licence with minor changes to update the existing provisions.
4. In general, Optus welcomes the remaking of the LIPD Class Licence noting that a person authorised to operate a device under this class licence is still required to meet the device compliance requirements of any standard or equipment rules applicable to it.
5. Optus similarly supports the ACMA's characterisation for the operation of class-licensed devices under this licensing framework. Namely that:
 - (a) Transmitters that are authorised do not require individual frequency coordination for interference management.
 - (b) The operation of the radiocommunications device must not cause interference to other licensed radiocommunications services.
 - (c) Devices will not be afforded protection from interference caused by other licensed radiocommunications devices.
 - (d) If interference does occur, it is the responsibility of the users of the radiocommunications devices to take measures to resolve it.¹
6. Optus, however, is concerned with the proposed approach to introduce new arrangements for emerging technologies which risk foreclosing future coordination for IMT in adjacent frequency ranges. To avoid these unintended consequences, we consider the ACMA should delay authorisation for such devices in the specified frequency ranges under the LIPD arrangements without a clear technical study and consideration of future band plans for both the relevant and adjacent bands.

Consideration of new items to facilitate the use of emerging technologies

7. In parallel, the ACMA is proposing to introduce new arrangements into the LIPD class licence to facilitate the use of emerging technologies. Optus does not support the proposed changes in their entirety.
8. Optus is concerned that the ACMA is prematurely entrenching decisions on future use of certain frequency bands. There is a risk that by enabling arrangements for certain devices to operate in certain frequency bands, including where it may be adjacent to

¹ ACMA, 2025, Consultation Paper, April, p.2

frequency bands where a formal decision has not been made, this may undermine the effectiveness of any future band planning decision.

9. We also refer the ACMA to the Australian Mobile Telecommunication Association (AMTA) submission.
10. The remainder of this submission sets out Optus' views on each of the proposed new arrangements.

Wireless multi-channel audio system (WMAS) technologies for wireless audio transmitters

11. WMAS technology for wireless audio transmitters uses the frequency range 520-694 MHz with a max EIRP of 100mW, in line with existing use of wireless audio transmitters in the 520-694 MHz band.
12. While ACMA specifies that the transmitters must not be used within the coverage area of a broadcasting service on the same frequency (according to the footnote, you can use channel finder for an available channel in an area), they also mention that as the 617-698 MHz band is included in the monitoring stage of band planning activities in the FYSO for the future of TV broadcasting, they do not propose to pre-empt that consideration in any way by restricting the frequency range for WMAS. However, this will not work if the 600 MHz is to be considered for IMT.
13. Optus is concerned that this presupposes a decision in the 600 MHz band has already been made to have it remain for TV broadcast (and wireless audio transmitters) and which would exclude operability with IMT at a future date.
14. The ACMA is also proposing to include additional limitations for wireless audio transmitters operating in the 1785-1800 MHz band.

Frequency hopping radiocommunications transmitters in the 5925–6425 MHz band

15. Refer to Optus' response from paragraph 18 onward.

Digital modulation radiocommunications transmitters in the 5150–5250 MHz band

16. Optus has no specific comments on this matter.

RLAN radiocommunications transmitters in the 6425–6585 MHz band

17. We refer the ACMA to the AMTA submission on the remaking on the LIPD for a detailed treatment of this topic.
18. Optus acknowledges the ACMA's decision for the reservation of the frequency range 6585-7100 MHz from the upper 6GHz band (6425-7125 MHz) for WA WBB use. We agree with the ACMA's recognition of the importance of future 5G/6G use to cater for the growing data demands with higher speeds and lower latencies, as well as supporting key policy priorities.
19. However, we reiterate our position regarding the immediate implementation of the proposed October 2025 allocation of the band below 6585 MHz to Wi-Fi. We recommend the ACMA delay modifications to the LIPD to incorporate this change until the final international position on this band is completed. This is to maintain consistency with the ACMA's stated position on making new band decisions in line with international developments.

20. If the ACMA chooses to implement the decision on Upper 6GHz in this LIPD update, then Australia will have:
- (a) Non-alignment with international development and equipment ecosystems;
 - (b) Unsupported Wi-Fi configurations by RLAN manufacturers;
 - (c) An inability to deliver 200 MHz wide WBB channels to achieve desired throughput outcomes for 5G-A and in future 6G; and
 - (d) Lost the option for the 3GPP use of the full upper 6GHz band, as the last and most likely band available to support these services.
21. Optus considers that delaying the inclusion of the Upper 6GHz will allow the ecosystems surrounding both IMT and Wi-Fi uses of the band to have matured to a sufficient extent to allow the ACMA to take advantage of international equipment supply, economies of scale and efficient use of spectrum in the band.
22. Should the ACMA choose to revise its position on Upper 6GHz, this would necessarily delay the proposed consultation on LIPD and AWL licensing arrangements in this band.
23. Notwithstanding the comment above, the ACMA should delay any consultation on licensing arrangements in this band until the international co-existence and coordination criteria have been established.

Radiodetermination radiocommunications transmitters in the 13.4–14 GHz band

24. Optus has no specific comments on this matter.

Radiodetermination radiocommunications transmitters in the 76–77 GHz band

25. Optus has no specific comments on this matter.