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Australian Communications and Media Authority
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To be submitted via [online submission](#)

Re: Remaking the low interference potential devices class license – Consultation paper

1 Introduction

Qualcomm International Incorporated (Qualcomm) welcomes the opportunity to provide input on the Australian Communications and Media Authority (ACMA) consultation paper entitled *Remaking the low interference potential devices class license*. We commend ACMA's continued efforts to enable innovative wireless technologies and promote efficient spectrum management.

Qualcomm is the world's leading wireless technology innovator and the driving force behind the development, launch, and expansion of 5G. When we connected the phone to the internet more than two decades ago, the mobile revolution was born. Our foundational technologies are found in every 3G, 4G, and 5G smartphone. Today, we are bringing the benefits of mobile to new industry verticals, and we are reinventing the automotive experience, the internet of things (IoT), and compute via AI and always connected laptops. Qualcomm is leading the way to a world where everything and everyone communicates seamlessly and efficiently.

Qualcomm provides the following input for ACMA's consideration regarding the proposed changes and new arrangements for the Low Interference Potential Device (LIPD) Class License.

2 General Comments

The LIPD class license has been instrumental in enabling the development and deployment of important wireless technologies. Over the past decade, the LIPD class license served as a cornerstone of Australia's successful spectrum policy, creating opportunities to deliver cutting-edge wireless devices that meet the demands of modern connectivity. Qualcomm supports the modernization of this license to reflect the continued growth and rapid pace of wireless innovation through expanding connectivity options in important spectrum bands, such as the 5 GHz bands and the lower 6 GHz band. As next-generation technologies such as Wi-Fi 6E and Wi-Fi 7 become more prevalent, this spectrum will support faster and more resilient ubiquitous connectivity.

Incorporating globally developed standards into the LIPD class license will ensure that Australian users benefit from economies of scale and lower equipment costs. Enhancing the LIPD class license will allow

Australians to continue to benefit from low-interference potential devices and ensure that Australia remains at the forefront of global wireless development.

Frequency Hopping Radiocommunications Transmitters in the 5925–6425 MHz Band

Qualcomm supports ACMA’s intention to align arrangements for low-power narrowband frequency-hopping transmitters in the lower 6 GHz band with ETSI EN 303 687. However, as explained in a separate filing Qualcomm is jointly submitting today with Cisco, Intel, and Meta, ACMA should wait to introduce narrowband frequency-hopping transmitters in the Lower 6 GHz spectrum until industry completes its work defining successful sharing parameters in ETSI EN 303 687 to enable fair coexistence between Wi-Fi and narrowband systems in the band.

Work is currently underway within the ETSI Technical Committee Broadband Radio Access Networks (BRAN) to revise ETSI EN 303 687, including efforts to develop a channel access mechanism for narrowband frequency-hopping equipment operation. ACMA should wait to authorize narrowband transmitters in the Lower 6 GHz band until this work is completed successfully. Establishing a consistent international approach to fair sharing between narrowband frequency hopping transmitters and wideband devices is important to preserve the long term viability and continue to grow the overall value of the bands. In addition, aligning with international efforts on fair sharing will enable economies of scale.

RLAN Radiocommunications Transmitters in the 6425–6585 MHz Band

As a leading provider of both IMT and RLAN technologies, Qualcomm has a unique viewpoint on the 6 GHz band. As the driving force behind the mobile device revolution, Qualcomm today is leading the development of 6G equipment to be deployed throughout the world later this decade. At the same time, Qualcomm is at the forefront of Wi-Fi innovation and is the world’s leading provider of Wi-Fi chipsets for Access Points and devices.¹

Having a spectrum home for 6G deployments later this decade is critically important to Australia’s economic success. So, before ACMA expands RLAN operations into the Upper 6 GHz band, e.g., within 6425-6585 MHz, it should ensure these expanded operations do not cause harmful interference to future adjacent IMT operations in the Upper 6 GHz band. ACMA should impose adequate protective measures, e.g., out-of-band emissions (OOBE) limits, on RLAN equipment deployed in the lower portion of the Upper 6 GHz band and ensure such equipment complies with those measures before it is deployed. Even with strong, but reasonably implementable, OOBE limits on RLAN equipment, there could be a performance impact (e.g., throughput and latency) on 6G systems operating directly above RLAN equipment in 6425-6585 MHz when the RLAN transmitter is near the 6G device. For wideband RLAN equipment using 160 MHz and 320 MHz channels, narrow guard bands may be ineffective in fully protecting 6G devices.

Accordingly, we recommend careful study of the benefits and tradeoffs of any guard bands between RLAN and IMT operations versus the additional capacity unhindered 6G IMT systems can provide. ACMA also should carefully consider and monitor the efforts to open the Upper 6 GHz band for IMT operations underway in the European Union, Brazil, Mexico, India, and China, as the Upper 6 GHz band will play an instrumental role in 6G deployments later this decade in most of the world.

¹ Qualcomm’s Wi-Fi chipsets operate in the 2.4 GHz band, the 5 GHz U-NII bands and in 6 GHz bands (in the lower 500 MHz from 5.925-6.425 GHz and in the full 1200 MHz from 5.925-7.125 GHz).

3 Conclusion

Qualcomm appreciates ACMA's proactive steps to ensure that the LIPD class license continues to support technological innovation and aligns with international approaches. Qualcomm's systems-level research and ecosystem support efforts are both helping the ecosystem with 5G deployments and contributing to the evolution of 5G to 6G and Wi-Fi improvements. We look forward to continued collaboration with ACMA to improve and enhance spectrum access and facilitate Australia's deployment of next-generation wireless technologies.

Thank you for the opportunity to comment on this LIPD Class License Consultation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nies Purwati'.

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