

**Subject: Response to ACMA Consultation on Remaking the Low Interference Potential
Devices Class Licence**

Dear ACMA Consultation Team,

On behalf of RFID General Public Trading Pty Ltd, I appreciate the opportunity to provide feedback on the proposed changes to the Low Interference Potential Devices (LIPD) Class License, specifically concerning its impact on UHF RFID technology.

1. **Importance of UHF RFID Technology:** UHF RFID technology is integral to various sectors, including logistics, retail, healthcare, and manufacturing. It enables efficient and accurate tracking of assets and inventory, which is essential for modern supply chain operations. Ensuring that the regulatory framework supports continued growth and innovation in UHF RFID applications is vital for these industries.
 - **Power Limits:** Increasing power limits for UHF RFID devices operating in the ISM band requires further review. The industry requests more power to solve challenging RFID applications involving metals and liquids. Maintaining optimal power levels for specific applications is crucial for the reliable performance of UHF RFID systems. The European Union (ETSI) regulation allows for 4W ERP (equivalent to 38.15 dBm EIRP), while Australia remains at 4W EIRP (equivalent to 33.75 dBm ERP). There is a need to align the power levels with new standards.
 - **Current ACMA Power Limitations:**
 - ACMA power limit at 4W EIRP: $36 \text{ dBm EIRP} - 2.15 = 33.75 \text{ dBm ERP}$
 - ETSI upper band power limit (4W ERP): $36 \text{ dBm ERP} + 2.15 = 38.15 \text{ dBm EIRP}$
 - **Proposed Change:** We propose adjusting ACMA's radiation power limits to **6.56W EIRP**, aligning them with ETSI regulations.

2. **Emerging RFID Use Cases:** Recent advancements in RFID technology have introduced new applications that require more power and bandwidth, such as:
- **Sensor Tags:** These tags integrate sensors to monitor environmental conditions like temperature, humidity, and motion. They require higher power levels to transmit sensor data reliably and efficiently.
 - **Real-Time Location Systems (RTLS):** RTLS applications use RFID technology to provide continuous, real-time tracking of assets and personnel within defined spaces. These systems often require increased bandwidth and power to ensure accurate and timely location updates.

Support for RFID General Public Trading: RFID technology plays an increasingly significant role in Australian Manufacturing and Retail sectors, supporting enhanced visibility, security, and efficiency across various marketplaces. The expansion of RFID applications in trading environments has allowed for automated stock management, loss prevention, and improved customer experiences. Ensuring that regulatory adjustments accommodate the growing needs of RFID within public trading spaces will support economic growth and technological advancement.

Thank you for the opportunity to provide feedback on this important matter. We look forward to the positive outcomes of this consultation process.

Sincerely,

Aanal Patel

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