

Comments of
The Ultra Wide Band (UWB) Alliance
Before the
Australian Communications and Media Authority
Regarding
Remaking the low interference potential devices class licence

May 16, 2025

About the UWB Alliance

The Ultra Wide Band (UWB) Alliance is a global not-for-profit organization that works to collectively establish ultra-wideband (UWB) technology as an open-standards industry. A coalition made up of vendors that either design, manufacture, or sell products that use ultra-wideband technology, the UWB Alliance aims to promote and preserve the current allocation of bandwidth as well as promote the continuing globalization of the technology. As part of our mission, we advocate UWB technology and use cases to promote verticals showing the value of UWB for IoT and Industry 4.0 and to build a global ecosystem across the complete UWB value chain, from silicon to service. In addition, the Alliance is promoting and assuring interoperability through its work with Standards Development Organizations such as the IEEE and ETSI and then working with members to define upper layers and testing to assure compliance. For more information, please visit us at www.UWBAlliance.org.

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The UWB Alliance thanks the Australian Communications and Media Authority (ACMA) for providing this opportunity to provide comments on remaking the low interference potential devices class licence.

We agree with and strongly endorse ACMA acknowledgement and use of EN 302 065 family of standards for UWB. We would encourage ACMA to adopt updates that are underway in ETSI as they become available.

We further note that ECC Decision (06)04 and draft EN 302 065-2-5 now provide for use of fixed location outdoors under specific conditions. We encourage ACMA to reconsider this restriction. The ability to use UWB with fixed devices outdoors under the conditions provided in ECC Decision (06)04 enables high-value use cases for precision location, presence detection, digital key for building access control, and more without risk of interference to other services. The technical studies underlying this update to the ECC regulations are documented in ECC Report 327. Allowing fixed outdoor with appropriate technical conditions will allow more fully utilizing the UWB capability currently available in many consumer devices such as mobile phones.

We further believe enabling fixed outdoor with appropriate technical conditions will foster innovation and more efficient and effective use of spectrum.