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May 16, 2025

VIA ELECTRONIC FILING AT [Online submissions](#)

Re: **Consultation paper: Remaking the Low Interference Potential Devices Class Licence**

Dear Colleagues,

Wi-Fi Alliance commends the Australian Communications and Media Authority (the “ACMA”) on its ongoing work in the area of spectrum management. The Consultation Paper on [Remaking the Low Interference Potential Devices \(LIPD\) Class Licence](#) and [Draft Radiocommunications \(Low Interference Potential Devices\) Class Licence 2025](#) represent a valuable opportunity to modernize Australia’s spectrum framework to support innovation and evolving connectivity needs. By outlining the ACMA’s priorities and inviting stakeholder feedback, this process ensures that regulatory decisions are informed by technical, economic, and practical considerations.

Wi-Fi Alliance appreciates the ACMA’s commitment to maintaining a dynamic and future-ready spectrum environment and makes the following recommendations to advance innovation, connectivity, and economic growth supported by the next-generation Wi-Fi technologies.

### **1) Frequency hopping Wi-Fi and RLAN transmitters in the 5925-6425 MHz band**

Wi-Fi Alliance acknowledges ACMA’s plans to consider arrangements for frequency-hopping spread spectrum devices in the 5925-6425 MHz band. In this regard, Wi-Fi Alliance respectfully asks the ACMA to establish an appropriate spectrum access mechanism that ensures fair coexistence among various LIPD technologies in the 6 GHz band. Fair and balanced spectrum access is essential—without it, Wi-Fi, frequency hopping, and other LIPD technologies operating in the 5925-6425 MHz band risk a “race to the bottom,” where spectrum could become congested and potentially unusable in many scenarios. To this end, Wi-Fi Alliance further encourages ACMA to recognize the effectiveness of contention-based protocols, such as Wi-Fi’s carrier sense multiple access with collision avoidance (e.g., Listen Before Talk), in enabling coexistence among multiple LIPD technologies. These protocols have been proven to facilitate efficient spectrum sharing, helping to preserve the integrity and usability of the band for all stakeholders.

These same contention-based protocols, which LIPD devices use to avoid interfering with one another, also serve to control interference to incumbent operations in the 5925-6425 MHz band. For example, the IEEE Wi-Fi specification requires energy detection at -62 dBm/20 MHz while the ETSI EN 301 893 prescribes -72dBm/20MHz . Wi-Fi Alliance members report that real-world

implementations can achieve even lower sensing thresholds, further enhancing compliance with the IEEE specification and improving protection for incumbent operations.

Importantly, FCC [47 CFR §15.407\(d\)\(6\)](#) mandates that all non-standard power transmitters (e.g., low-power indoor and very low power) operating in the 5.925-7.125 GHz employ contention-based protocols. Similarly, ETSI EN 303 687 requires the use of a "listen before talk" protocol to ensure efficient spectrum sharing among WAS/RLAN devices (see Section 4.3.6.3.2.1).

***Recommendation for changes to Draft for Consultation Radiocommunications (Low Interference Potential Devices) Class Licence 2025:***

Part 8, Table 8, Clause 42 Additional limitations for table item 5 (Page 30)

ADD "(5) A radiocommunications transmitter must use contention-based protocols for multiple access.

*Example: Carrier Sense Multiple Access (CSMA) and Multiple Access Collision Avoidance (MACA) are examples of contention-based protocols."*

**2) RLAN radiocommunications transmitters in the 6425–6585 MHz band**

In December 2024 [Outcomes paper: Future use of the upper 6 GHz band](#), the ACMA astutely observed that international standards and markets are important factors that impact Australia's unique arrangements and markets.<sup>1</sup> And, decisions by the US, Canada, South Korea, and other leading economies to make the full 6.425–7.125 GHz band available for Wi-Fi use has catalyzed a robust international equipment ecosystem. Australia stands to benefit from aligning with this trend, ensuring access to a global market of interoperable, cost-effective Wi-Fi 6E and Wi-Fi 7 devices. Introducing full-band RLAN use, rather than segmenting the band, would maximize economic and consumer benefits. Conversely, without regulatory harmonization, Australia risks becoming a "secondary market" where cutting-edge Wi-Fi devices and applications arrive late, are prohibitively expensive, or are entirely unavailable. Notably, the recent ACMA decision to allow Wi-Fi access to 6.425-6.585 GHz, enabling one additional 160/320 MHz wide channel, does not address spectrum requirements in dense Wi-Fi deployment scenarios in enterprise, urban, and public settings where spectrum reuse is essential to manage interference and maintain high performance. In this regard, Wi-Fi Alliance seeks to highlight to the ACMA's attention a [recent proposal by the UK's Ofcom](#) that maximizes spectrum efficiency while maintaining long-term regulatory flexibility. In this proposal, Ofcom outlined a two-phased approach:

- In Phase 1, Ofcom proposes immediate Wi-Fi access to the 6.425–7.125 GHz. This action will allow UK consumers, businesses, and industries to immediately benefit from cutting-edge Wi-Fi 7 technologies, improving broadband capacity, reducing congestion, and enabling advanced applications such as AR/VR, cloud computing, and smart infrastructure.

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<sup>1</sup> Future use of the upper 6 GHz band Outcomes paper (December 2024) at 9

- In Phase 2, Ofcom intends to introduce a structured coexistence model between Wi-Fi and mobile, potentially prioritizing between 160 MHz and 400 MHz for Wi-Fi, while also allowing high-power mobile deployments in high-demand areas. This ensures that mobile networks can evolve without unnecessarily delaying or restricting Wi-Fi access.

By allowing advanced Wi-Fi to deliver immediate benefits while maintaining flexibility for future mobile use, Ofcom ensures that spectrum is never underutilized, and that both technologies can thrive without unnecessary delays. Ofcom's phased approach offers a best-in-class regulatory model for the upper 6 GHz that the ACMA should seriously consider.

Wi-Fi Alliance respectfully asks the ACMA to consider a balanced and forward-looking approach—one that enables near-term Wi-Fi access in the 6.425–7.125 GHz band while maintaining flexibility for future regulatory action. To position Australia as a global leader in connectivity, it is essential to ensure that both Wi-Fi and mobile technologies contribute to the country's long-term digital success. To this end, Wi-Fi Alliance recommends that the ACMA allow certification of client Wi-Fi devices operating across the full 5925–7125 MHz band. This adjustment will foster a robust client device ecosystem, ensuring that client Wi-Fi devices sold and deployed in Australia today are well-prepared to support the outcome of the ACMA's planning process for the 6585–7100 MHz band.

***Recommendation for changes to Draft for Consultation Radiocommunications (Low Interference Potential Devices) Class Licence 2025:***

Part 8, Table 8, Clause 48 Additional limitations for table item 13 (Page 31)

ADD "(5) *Permitted operating frequency band for RLAN radiocommunications transmitters client devices is 5925-7125 MHz.*"

**Conclusion**

Wi-Fi Alliance appreciates the opportunity to contribute to the ACMA's spectrum management efforts.

Respectfully submitted,

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**WI-FI ALLIANCE**

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