

Online Submission

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The Manager

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ACMA consults on updates to Earth station and PTP coordination rules

Viasat, together with its subsidiaries, Inmarsat Leasing (Two) Limited and Inmarsat Solutions BV (as “**Inmarsat**”), welcomes the opportunity to comment on the Australian Communications and Media Authority (ACMA)’s ‘Updates to earth station and PTP coordination rules’ dated March 2025 (the “**Consultation Paper**”). Viasat is pleased to provide comments, particularly on the updated draft of the Radiocommunications Assignment and Licensing Instruction (RALI) MS45 ‘Frequency coordination requirements between microwave fixed point-to-point links and FSS earth stations’.

General comments

Viasat supports the ACMA’s decision to expand RALI MS45 to include more frequency bands in the instruction where earth stations and earth receive stations share spectrum with point-to-point (PTP) links. It is noted that the proposed additional bands have been selected because demand for new assignments is likely to increase. In Appendix A, Table 6 of the Consultation Paper, the number of PTP and Earth receive station licenses operating within each of the bands is provided. It should be noted that what is not included are the many mobile earth stations and Very Small Aperture Terminal (VSAT) earth stations that operate in some of these bands under the ‘Radiocommunications (Communication with Space Object) Class Licence 2015’.

Passbands and protection criteria for earth receive stations

The draft RALI MS45 provides protection criteria for earth receive stations, which are critical to Viasat. Section 2 of the draft RALI MS45 includes identifying and protecting earth receive stations from PTP link transmitter emissions. The following areas of the RALI we would propose need further consideration:

1. The Earth receive station passband is often the full frequency range of the satellite downlink band. Thus, the frequency cull method used to identify the range of frequencies that need to be considered is not as appropriate for Earth receive stations as it is for PTP link receivers. Viasat has proposed in section 2.1.2.2 alternative text for consideration.

2. Similarly, in section 2.2.2 where the maximum interference levels are discussed, Viasat would propose that the accredited assigner be made aware that the Earth receive station is not channelised, PTP link transmitters may well be in the passband of the Earth receive station and the out-of-band emissions of PTP link transmitters need to be assessed. Thus, Viasat would suggest that the statement that PTP link transmitter “emissions that are beyond the second adjacent channel (i.e. in the spurious domain) do not need to be considered” may be misleading. We would propose not including that sentence and leaving the assessment to the accredited person based on the specific site conditions between the PTP link transmitter and Earth receive station, as well as noting the guidance material in the Spectrum Planning Report SPP 2014/07.
3. No coordination arrangement is proposed in the draft RALI to manage receiver overload specifically; it leaves it up to the accredited person when planning the deployment of new earth receive stations or PTP transmitters. While in-band and out-of-band emissions from the PTP link transmitter into the passband of the Earth receive station are likely to be the major contributors to interference (points 1 and 2 above), the LNB input (receiver) overload figure of -65 dBm as accepted by the ACMA for C-band (3400-4200 MHz) could be included for reference.

Please find attached an Annex containing an amended draft of RALI MS45. This includes proposed changes as indicated above, as well as marginal comments on a number of editorial suggestions for ACMA to consider.

Viasat appreciates the opportunity to provide feedback on these updates to RALI MS45 for ACMA's consideration.

Sincerely,

[Redacted signature]

Vice President
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Encl.: Amended draft RALI MS45 containing mark-ups with Viasat proposed changes