

Australian Communications and Media Authority (ACMA)

25 March 2025

Subject: Submission on Five-Year Spectrum Outlook and 2025–26 Work Plan – Expansion of Class Licensing for Millimetre Wave Body Scanners

To whom it may concern,

MA Services Group (MASG) welcomes the opportunity to provide this submission in response to the Australian Communications and Media Authority (ACMA) consultation on its Five-Year Spectrum Outlook and 2025–26 work plan.

As a leading provider of security services, including across critical infrastructure, we appreciate the vital role that radiocommunications policy plays in enabling effective security measures. In particular, we wish to highlight the importance of millimetre wave body scanners and the need for their expanded use beyond airport environments under the class licensing framework.

The Role of Body Scanners in Critical Infrastructure Protection

Body scanners play a crucial role in security screening operations, enhancing safety and risk management for high-security environments. While airports have benefited from the deployment of millimetre wave body scanners under the existing class licence, similar security concerns exist across a wide range of other critical infrastructure facilities, including:

- Power plants and energy facilities
- Government buildings and defence installations
- Transportation hubs such as train stations and bus terminals
- Large-scale public events and stadiums
- Corporate and commercial buildings with high-security requirements.

Restricting the use of millimetre wave body scanners to airport environments under the current class licensing regime significantly limits their broader security applications. Expanding the scope of the class licence to include other critical infrastructure locations would greatly enhance national security capabilities while maintaining efficiency in licensing administration.

Challenges with the Current Licensing Regime

Currently, millimetre wave body scanners can only be operated outside of airports under an individual apparatus licence issued under the Radiocommunications Act 1992 (Cth). This arrangement presents several challenges:

- **Regulatory and Administrative Burden:** The requirement for individual licensing creates additional administrative complexity and delays, particularly for security providers managing multiple high-risk sites.
- **Increased Costs:** The need to obtain individual licences introduces financial constraints, limiting the ability of security organisations to deploy these technologies where they are most needed.

- **Security Gaps:** The inability to readily deploy body scanners at critical infrastructure locations increases security vulnerabilities, leaving key sites at risk.
- **Barrier to Continuous Improvement:** The current licensing restrictions presents a barrier to continuous improvement in security operations, preventing organisations from adopting and refining best practices in threat detection.

The Need for an Expanded Class Licensing Framework

To address these challenges and enhance security across Australia's critical infrastructure, MASG strongly urges ACMA to consider expanding the existing class licensing framework to allow for the operation of millimetre wave body scanners beyond airport environments. This expansion would:

- Enable organisations like MASG to deploy advanced screening technologies efficiently and cost-effectively.
- Enhance national security by providing high-risk facilities with the same level of security screening currently available at airports.
- Maintain regulatory efficiency by providing clear operational parameters under a broader class licence, without the need for individual approvals.
- Align Australia's security framework with international best practices, where millimetre wave body scanners are increasingly used in diverse security settings.

The Need for Expanded Frequency Range

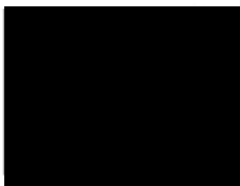
We would also encourage ACMA to consider reviewing the current body scanner licensing arrangements to facilitate the operation of body scanners within the 20–40 GHz frequency range as part of its 2024–25 Work Program.

MASG understands that modern body scanning technology operates within this frequency range. Although this technology is not currently covered under the existing licensing framework, it offers numerous advantages, including significantly lower false alarm rates, enhanced privacy, and greatly improved resolution and threat detection.

We appreciate ACMA's consideration of this important issue and MASG strongly supports ACMA's ongoing efforts to improve radiocommunications licensing arrangements.

Thank you for your time and consideration.

Sincerely,



Travis Jones

Director Critical Infrastructure Protection
MA Services Group