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The Manager
Major Spectrum Allocations Section
Australian Communications and Media Authority
PO Box 78
BELCONNEN ACT 2616

Comments on IFC 10/2022
Proposed spectrum re-allocation declaration for the 3.4 GHz and 3.7 GHz bands

DB Telecommunications Pty Ltd is pleased to be able to offer some comments on the various issues raised in the ACMA's consultation paper.

The ACMA's preferred planning approach: urban excise spectrum

Do you have comments on our preferred approach to:

- > issue spectrum licences in the 3400–3475 MHz frequency range in urban excise areas in accordance with Option A?
- > allocate spectrum in the 3800–4000 MHz band for LA WBB use using the segmentation approach?

DB Telecommunications does not support the issue of spectrum licences across the full 3400-3475 MHz frequency range in urban excise areas proposed in Option A.

DB Telecommunications favours Option B, as it believes that it is important to provide some degree of apparatus licensed spectrum to support LA WBB use in the urban excise area.

While acknowledging the ACMA's plans for the provision of apparatus licence spectrum within 3800 – 4000 MHz in metropolitan areas, DB Telecommunications believes that it is important to provide some apparatus licensed spectrum in 3400-3475 MHz in urban excise areas to allow the deployment of LTE/4G solutions.

Perhaps a hybrid spectrum licensing/apparatus licensing mix could be considered for 3400-3475 MHz in urban excise areas. DB Telecommunications believes that the apparatus licensed partition would need to be at least 10-15 MHz wide to support restricted cell LA WBB deployments.

This would follow the lines of Option 4 which was presented in the ACMA's September 2021 consultation paper associated with IFC 31/2021. DB Telecommunications believes that this would provide the best balance the shorter-term needs of LA WBB operators wishing to deploy solutions based on current LTE/4G technologies and the longer-term requirements of spectrum licensees wishing to deploy macro cell WBB deployments.

DB Telecommunications does support the ACMA's approach to allocate spectrum in the 3800–4000 MHz band for LA WBB use using the segmentation approach for the greater certainty of spectrum that it provides to organisations wishing to deploy LA WBB services. However, the ACMA's proposal to use the segment 3950 – 4000 MHz for this, may disadvantage some organisations wishing to do an early deployment of LA WBB services in 3800–4000 MHz, given the current limited options for equipment operating above 3900 MHz. This would certainly disadvantage organisations wish to deploy current LTE/4G solutions, in the short term.

The most appropriate frequency range for this LA WBB segment needs more investigation to balance the shorter-term equipment supply constraints and longer-term spectrum planning efficiency constraints.

The ACMA's preferred planning approach: 3400–3575 MHz and 3700–3800 MHz

Do you have comments on our preferred planning option (Option 3), which updates the previous preliminary planning decisions (Option 1)?

Please provide evidence in support of your comments. See also the 'Specified parts of the spectrum' section of this paper.

DB Telecommunications does not support Option 3, because it does not provide any apparatus licensed spectrum for LA WBB in the frequency range 3475 – 3540 MHz in regional areas. DB Telecommunications believes that it is important to retain Option 1, or possibly adopt Option 2, in order to support organisations which wish to deploy current 4G/LTE solutions in regional areas.

4G/LTE type solutions are likely to provide more cost-effective options for smaller organisations and enterprises looking to deploy LA WBB solutions in regional areas, compared to the more expensive emerging 5G solutions. The frequency range 3475 – 3540 MHz falls within LTE band B42 for which equipment is readily available.

The ACMA's proposal: licence type

If the ACMA makes a re-allocation declaration, do you have comments on our proposal to issue spectrum licences in the 3.4 GHz (including in regional areas and in urban excise areas) and 3.7 GHz bands?

Please provide evidence in support of your comments.

DB Telecommunications supports the ACMA's proposal to issue spectrum licences in the 3.4 GHz and 3.7 GHz bands, except for those segments in the urban excise and regional areas which it believes should be retained for apparatus licensing of LA WBB services. AWLs would be the preferred method of apparatus licensing those LA WBB services.

The ACMA's proposal: parts of the spectrum

If the ACMA makes a re-allocation declaration, do you have comments on our proposal to declare for re-allocation the parts of the spectrum in accordance with our proposed planning option (Option 3, 'Planning options', above)?

We welcome stakeholder views on the parts of the spectrum proposed for re-allocation, particularly the inclusion of the frequency ranges 3475–3492.5 MHz, 3492.5–3510 MHz and 3510–3542.5 MHz in specified geographic areas as described under Option 3 in 'Planning options'.

As noted in the two answers above, DB Telecommunications does not support Option 3, preferring the retention of some apparatus licensed spectrum in the frequency range 3475 – 3540 MHz in urban excise and regional areas, for the deployment of LA WBB services in those areas under AWLs.

Accordingly, DB Telecommunications supports the ACMA's proposal to re-allocate spectrum for spectrum licensing in the following areas:

60 - 65 MHz (3400 – 3460/3465 MHz) in urban excise areas
42.5 MHz (3400–3442.5 MHz) in regional area 1
25 MHz (3400–3425 MHz) in major regional centres 2
32.5 MHz (3542.5–3575 MHz) in regional Western Australia central
100 MHz (3700–3800 MHz) in metropolitan and all regional areas

DB Telecommunications would support the amount of spectrum allocated to spectrum licensing being reduced to 50 MHz (3700 – 3750 MHz) in all regional areas, as proposed in Option 3.

The ACMA's proposal: re-allocation period and deadline

If the ACMA makes a re-allocation declaration, do you have comments on our proposal for a re-allocation period of 5 years from the commencement of the re-allocation declaration, and a re-allocation deadline of 12 months before the end of the re-allocation period?

Please provide evidence in support of your comments.

DB Telecommunications would be happy to support the proposed re-allocation period of 5 years.

The ACMA's view: licence term and commencement

We seek stakeholder views on the appropriate spectrum licence duration.

Our preliminary view is that licences should commence shortly after an auction.

On balance, DB Telecommunications would favour a shorter licence duration with all 3.4 GHz and 3.7 GHz spectrum licences expiring on 13 December 2030, in order for the expiry date of the different licences to be aligned with the expiry date for existing licences in adjacent bands.

DB Telecommunications also of the view that the spectrum licences should commence shortly after conclusion of the auction process, given the relatively short licence duration.

The ACMA's preferred view: lot configuration (frequency)

If the 3.4 GHz band in regional areas is re-allocated, our preliminary view is to divide the spectrum into 10 MHz lots, with one or more leftover lots of 2.5 MHz, 5 MHz or 7.5 MHz, depending on the region. Alternatively, we may consider 5 MHz lots with 7.5 MHz leftover lots.

If the 3.4 GHz band in urban excise areas is re-allocated, our preliminary view is to divide the spectrum into 10 MHz lots, with a leftover lot of 15 MHz at 3460–3475 MHz.

If the 3.7 GHz band is re-allocated, our preliminary view is to divide the spectrum into 10 MHz lots.

We invite comments from stakeholders on bandwidth configuration options.

As noted in the sections, DB Telecommunications has a strong preference for 3.4 GHz band spectrum being retained for apparatus licensing in the urban excise and regional areas.

If the 3.4 GHz band in regional areas is re-allocated, DB Telecommunications would favour dividing the spectrum into 5 MHz lots, with the leftover 7.5 MHz being retained for apparatus licensing, at a minimum.

If the 3.4 GHz band in urban excise areas is re-allocated, DB Telecommunications would support the spectrum being divided into 10 MHz lots, with 7.5 MHz being retained for apparatus licensing, at a minimum.

If the 3.7 GHz band is re-allocated, DB Telecommunications would support the proposal to divide the spectrum into 10 MHz lots.

The ACMA's view: lot configuration (geography)

We welcome submissions from stakeholders on the most appropriate geographic area configuration for the spectrum.

DB Telecommunications does not have any particular views on the most appropriate geographic lot configuration for the spectrum. DB Telecommunications will leave to potential bidders at the spectrum auctions to comment on this issue.

The ACMA's preferred view: allocation methodology

Do you have comments on the proposal to use the 2-stage generic lots clock auction format for this allocation?

Please provide evidence in support of your comments.

DB Telecommunications does not have any particular views on the proposed spectrum auction format. DB Telecommunications will leave to potential bidders at the spectrum auctions to comment on this issue.

The ACMA's preferred view: minimum spectrum requirement

Do you have comments on our preliminary view to offer bidders at auction an MSR of 2 lots, particularly if the 2-stage clock auction with generic lots is used?

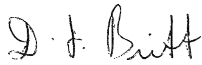
Please provide evidence in support of your comments.

DB Telecommunications does not have any particular views on the proposed minimum spectrum requirement. DB Telecommunications will leave to potential bidders at the spectrum auctions to comment on this issue.

DB Telecommunications wishes to thank the ACMA for the opportunity to respond to this consultation paper and looks forward to being able to elaborate on the comments made in this submission, if required.

If you would like additional information or wish to discuss any aspect of my submission, please do not hesitate to contact me on (03) 9331 3170 or by email dbritt@dbtelecomm.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. J. Britt'.

David Britt
Director