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Our reference: AUS-10
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5 February 2026

The Manager, Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78
Belconnan ACT 2616

Dear ACMA Spectrum Planning Team,

Re: Automatic Frequency Coordination-Assisted Spectrum Sharing in the 6 GHz Band

Austroads appreciates the opportunity to comment on the ACMA's discussion paper regarding the potential introduction of Automatic Frequency Coordination (AFC) in the 6 GHz band.

Austroads is the association of the Australian and New Zealand transport agencies, representing all levels of government. We provide high-quality, practical and impartial advice, information, tools and services to help our members to deliver efficient, reliable and safe mobility to their customers.

Austroads has undertaken work on the spectrum requirements for Cooperative Intelligent Transport Systems (C-ITS), including the importance of retaining the 5.9 GHz band to support safety-critical and operational transport applications¹. C-ITS is expected to deliver substantial public benefits, including improved road safety outcomes, greater network efficiency, and enhanced traffic and incident management. It requires the use of spectrum which is uncluttered, clear, well-managed and relatively free of interference².

Austroads and its members are currently delivering the National Connected and Automated Vehicle (CAV) Action Plan which were agreed by all Commonwealth, state and territory Infrastructure and Transport Ministers and released on 17 October 2025. One of the workstreams is developing a roadmap to advance harmonised deployment of C-ITS in Australia.

In this context, Austroads' primary concern is the potential interference risk to the adjacent 5.9 GHz ITS band from higher-power devices operating under an AFC regime in the 6 GHz band. This risk to the adjacent band is not currently addressed in the consultation paper. If standard-power devices (transmitting up to 36dBm EIRP) are introduced without sufficient mitigation measures, there is a credible risk of out-of-band emissions (OOBE) affecting the adjacent 5.9 GHz ITS band. Any degradation to the reliability or performance of C-ITS communications could undermine the safety and efficiency benefits intended from current and future deployments.

Austroads notes positively that ACMA has commissioned trials of AFC. These trials will be critical in clearly characterising the frequency and power envelopes within which AFC-enabled devices can operate without causing interference to C-ITS services. It is essential that any future regulatory framework ensures that real-world deployments of other technologies operating in the 6 GHz band do not breach the permissible technical boundaries identified through those trials.

¹ Austroads (2008) *Intelligent Vehicles and Infrastructure: The case for securing 5.9GHz*

² Austroads (2012) *C-ITS 5.9 GHz Spectrum Management and Device Licensing Regime Report*

Should ACMA proceed further with the proposal, Austroads encourages ACMA to address this risk explicitly at this early stage, including how ACMA proposes to manage and enforce any mitigation measures so that C-ITS services and devices can operate without interruption or compromise.

The United States, Canada, and parts of Europe have all grappled with balancing 6 GHz innovation and ITS protection. Regulators have applied mitigation measures such as:

- introducing protective guard bands,
- applying tighter OOB limits for standard-power RLAN use, or
- incorporating location-based operational restrictions to prevent interference with ITS corridors.

Austroads recommends that ACMA carefully examine these international measures and consider adopting comparable protections tailored to the Australian context.

Austroads supports continued engagement with ACMA on this topic. Thank you for considering our views.

Yours sincerely



Paul Davies
General Manager- Research Guidance and Practice

Responses to Selected Consultation Questions

Q1 – Support for AFC Framework

Austroads does not oppose the exploration of AFC in principle.

However, adoption should proceed only if ACMA can ensure robust protections for the 5.9 GHz ITS band, including enforceable mitigation measures.

Q7 – Roles of Government and Industry

For matters affecting safety-critical communications, ACMA must retain strong regulatory authority. Industry may operate AFC systems, but ACMA must set mandatory protection requirements, particularly regarding ITS band coexistence.

Q12 & Q13 – Technical Features, Data Integrity and Enforcement

Protection of ITS services requires:

- high-accuracy real-time location data
- rigorous database integrity
- minimal latency in AFC updates
- demonstrable ability to enforce geofencing or exclusion zones

Austroads recommends these be incorporated as mandatory system requirements, not optional features.