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Take Control... **duxtel**

Response to ACMA Discussion paper:

**“Automatic Frequency Coordination  
– assisted spectrum sharing in the 6 GHz band”**

**About DuxTel:**

DuxTel is an Australian-based value-added distributor of data networking equipment (predominantly MikroTik, Mimosa, RF Elements and others), providing network infrastructure hardware, software, consulting and training solutions across Australia and the Pacific region.

DuxTel is a registered carrier (Carrier Licence No. 365), and many of our customers, clients and partners are registered carriers and ISP operators, including Wireless Internet Service Providers (WISPs).

DuxTel largely supports the formal response to the discussion paper submitted by the Wireless Internet Service Providers Association, with the following important variations outlined below, referenced against ACMA’s published *Questions for Comment*:

**4. Would established models in other jurisdictions such as the US and Canada, or aspects of these models, be appropriate for the Australian radiocommunications environment?**

Our position is that there is a significant missed opportunity in the way AFC is currently implemented internationally, particularly in relation to coordination between shared operators. Present AFC models are primarily focused on preventing interference with incumbent licensees, and generally do not seek to facilitate efficient spectrum sharing between multiple AFC-managed networks.

If a centralised or commonly accessible mechanism existed to record geolocated and coordinated spectrum assignments, it would be possible to reduce the likelihood of colliding transmitters and achieve materially better outcomes for all operators.

**6. What degrees of geographic and spectrum segmentation should be considered when planning for individual AFC system deployments?**

For the purpose of fostering efficient sharing of spectrum resources, DuxTel submits that AFC service providers should be encouraged to publish allocated spectrum assignments in a manner that enables other accredited AFC providers to avoid duplication. This approach would reduce congestion and unnecessary transmit competition, while remaining compatible with incumbent protection requirements.



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## **7. What are the respective roles and responsibilities for industry and government in realising an AFC regime?**

Developing an AFC solution capable of coordinating spectrum access on a national scale is a complex challenge, but not an insurmountable one. DuxTel considers that the appropriate role of government is to establish a regulatory framework that encourages and enables industry participants to design, build and deploy effective AFC solutions within clearly defined boundaries.

## **8. What role should databases such as the ACMA's RRL or other coordination mechanisms, such as those administered by the ACMA but used by accredited assigners, play in the process?**

An expanded RRL capable of storing temporary AFC-allocated assignments would allow AFC providers to select spectrum assignments that minimise impact on AFC-administered networks already operating at a given location. Such an approach would materially improve coordination outcomes while maintaining regulatory oversight.

## **10. With respect to licensing, should individual AFC-coordinated devices be registered on the RRL or covered by broader system-wide licensing arrangements?**

DuxTel supports the registration of AFC-coordinated devices on the RRL. We consider that such registration would deliver significantly improved spectrum efficiency within AFC-managed bands. Licensing should remain class-based, with appropriate LIPD conditions specifying AFC implementation requirements and operational parameters.

### **Summary:**

DuxTel considers the introduction of Automated Frequency Coordination (AFC) in the 6 GHz bands to be a rare opportunity to embed long-term spectrum efficiency at the outset, rather than attempting to retrofit coordination mechanisms after congestion and contention have become established.

Experience in other licence-exempt bands demonstrates that, once unmanaged sharing becomes entrenched, it is extremely difficult to reverse the resulting inefficiencies. An effective national AFC framework in the 6 GHz bands therefore has the potential not only to avoid the congestion already evident in the 900 MHz, 2.4 GHz and 5 GHz bands, but also to establish a regulatory model that could inform more structured approaches to spectrum sharing in other bands over time.

Australia has previously demonstrated that clear, decisive regulatory measures can deliver substantial public benefit, including through the allocation of the 5.6 GHz band for exclusive weather radar use in order to protect critical national infrastructure. DuxTel submits that the implementation of AFC in the 6 GHz bands presents a similarly important opportunity to adopt a coordinated, forward-looking approach that balances incumbent protection with efficient and equitable use of shared spectrum resources.

DuxTel encourages ACMA to view the 6 GHz AFC framework not solely as a band-specific mechanism, but as a potential foundation for more sophisticated spectrum-sharing models in the future.

