



Telstra Group Limited

**Submission to ACMA Discussion Paper:
Automatic Frequency Coordination-assisted
spectrum sharing in the 6 GHz band**

Public Submission

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Appendix 1: Response to consultation questions

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01 Executive Summary

Telstra welcomes the opportunity to provide its perspective on the ACMA's discussion paper regarding Automatic Frequency Coordination (AFC)-assisted spectrum sharing in the 6 GHz band. As one of Australia's largest users of this spectrum, Telstra understands the strategic importance of the 6 GHz band for both critical telecommunications infrastructure and the future of wireless broadband. Our extensive network of point-to-point (PTP) microwave links in this band supports essential services, including Triple Zero emergency calls, and any changes to spectrum management must prioritise the protection and reliability of these vital communications. In addition, Telstra's NBN services are usually provided with wireless gateways, making Telstra one of the largest suppliers of Wi-Fi equipment in Australia.

While Telstra acknowledges the growing demand for Wi-Fi 6E/7 and the increasing prevalence of devices operating in the 6 GHz band, we do not support the introduction of AFC for Standard Power (SP) devices. Our position is informed by several key considerations:

- **Unproven Efficacy and Risks of AFC:** AFC systems remain largely untested in real-world environments, with limited deployments internationally and limited empirical evidence that they can reliably safeguard incumbent fixed services under diverse operational conditions. Critical uncertainties persist regarding database integrity, aggregate interference, and the ability to enforce compliance against rogue or misconfigured devices. Given the life-critical nature of services carried over our PTP links, even rare interference events could have catastrophic consequences for public safety.
- **Aggregate and Adjacent Band Interference:** The introduction of SP devices, particularly in outdoor or elevated installations, poses significant risks of direct interference (where high-gain antennas are used) and/or aggregate in-band and adjacent-band interference. Current AFC models do not consider the cumulative impact of multiple SP devices, nor do they provide sufficient guard band protection for future Wireless Broadband (WBB) services in the upper 6 GHz band.
- **Trial Limitations and Need for Further Evidence:** Ongoing trials, such as the WISPAU initiative, are limited in scope and do not adequately test coexistence in high-pressure, real-world scenarios. Telstra urges that any policy decisions be based on comprehensive, large-scale trials with active participation from all major incumbents and robust, automated processes.
- **Operational and Economic Considerations:** The cost-benefit case for AFC remains unproven, particularly given the significant overheads associated with implementation, maintenance, and compliance. Alternative spectrum bands (such as the 3 GHz and 26/28 GHz bands) and licensing models (such as AWLs and apparatus licences) are available for operators seeking higher-powered Wi-Fi services; the current demand for AFC-enabled SP devices in the 6 GHz band has not been demonstrated.

Another critical decision that has an impact on the upper 6 GHz band, and the services that will be used in this band, is the reallocation decision to allocate the band to mobile WBB services. This will trigger a multi-year program to clear fixed link services across both metropolitan and regional areas. Clearance



of the upper-6 GHz band will, in part, rely on moving links to the lower-6 GHz band, which means that the lower-6 GHz band must be prioritised for fixed links.

Should the ACMA decide to proceed with AFC, Telstra strongly advocates for a cautious, staged approach. This must include the establishment of a clear regulatory framework, rigorous technical standards, transparent governance and comprehensive stakeholder engagement. Telstra would recommend restricting AFC-controlled SP device operations to the lower portion of the lower 6 GHz band (specifically 5925 – 6265 MHz) and reserving the upper portion of the lower 6 GHz band (i.e. 6265 – 6585 MHz) for Very Low Power (VLP) and Low Power Indoor (LPI) devices to ensure coexistence and protect both incumbent and future users. Any AFC implementation should enforce strict exclusion zones, feature real-time monitoring and maintain a central, publicly accessible database for all AFC-managed devices. The protection of incumbent services, particularly those supporting critical infrastructure, must remain paramount.

In conclusion, Telstra's position is that the introduction of AFC in the 6 GHz band is unwarranted. Any move towards AFC must be contingent on robust evidence of its effectiveness, the implementation of stringent safeguards, and the assurance that Australia's critical communications infrastructure will not be compromised.



02 Strategic Importance of the 6 GHz Band

Telstra recognises the strategic importance of the 6 GHz band; we are among the largest users of this band. We currently operate 731 point-to-point microwave (PTP) links in this band having 2908 assignments in the frequency range from 5925 – 6585 MHz. These PTP links, utilising 6.1 and 6.7 GHz spectrum, carry a variety of essential traffic for our mobile and fixed customers, including Triple Zero emergency calls.

We also acknowledge that many handsets, customer premises equipment, access points and chipsets support 6 GHz Wi-Fi (Wi-Fi 6E/7), and that this number continues to grow. In Australia, the RLAN/Wi-Fi frequency allocation for this band covers 5925 – 6585 MHz, also known as the lower 6 GHz (L6) band and include Very Low Power (VLP) (14 dBm EIRP) and Low Power Indoor (LPI) (24 dBm EIRP) devices operating under the Low Interference Potential Devices (LIPD) class licence. The ability to provide wider channels, up to 160 and 320 MHz, is important to sustain high-throughput local connectivity to homes and enterprises.

The upper 6 GHz (U6) band (6585 – 7100¹ MHz) is one of the few viable additional mid-band growth opportunities for International Mobile Telecommunications (IMT) services in populated areas over the next 3 – 7 years. This band, with its favourable propagation characteristics and the ability to use existing radio/antenna form factors, is critical for future 6G services. It is also important to note that many PTP links operating in the 6.7 GHz band will need to be cleared; some of these links will be moved to the lower 6 GHz band to preserve the critical services outlined below, which will further increase spectrum demand in that range.

As such, the 6 GHz band is vital for both licence-exempt and licensed use cases – provided coexistence between incumbent licensees, RLAN/Wi-Fi and IMT/wide-area wireless broadband (WBB) operators and users can effectively be engineered and managed.

¹ In this discussion paper, we treat 7100 MHz as the upper bound of the upper 6 GHz band. Initiatives to move the upper bound to 7125 MHz (by compression of apparatus-licensed Television Outside Broadcast spectrum) or by moving the upper bound to 7250 MHz (agenda item 1.7 of WRC-27) are important matters but outside the scope of this discussion paper and its focus on AFC in the lower 6 GHz band.



03 Telstra Does Not Support AFC

As a tier 1 telecommunications provider, we rely on Point to Point (PTP) links using 6.1 GHz spectrum to deliver safety-of-life communications through the Triple Zero emergency telephony service. This spectrum is integral to ensuring that Australians can access emergency assistance without delay or disruption. In addition to Triple Zero traffic, other critical consumer and enterprise voice, data and messaging traffic is also carried by these PTP links. Any unmanaged or unintended interference in this band poses a severe risk to service continuity. Such interference could compromise call routing, degrade voice quality, or even prevent emergency calls from connecting – outcomes that could have catastrophic consequences for public safety. Given the life-critical nature of these communications, maintaining a highly protected and interference-free environment is our overriding concern. Therefore, we do not support any implementation that might negatively affect our services or customers, including Automatic Frequency Coordination (AFC), for reasons that will be explained in this chapter.

3.1. AFC Is Still Unproven in Real World Environments

Although AFC has been proposed as a mechanism to increase the efficiency of frequency coordination in the 6 GHz band, its effectiveness remains unvalidated. To date, AFC in the 6 GHz band has seen limited deployment with only Canada and the USA supporting active systems currently. We have not seen empirical evidence demonstrating that AFC can reliably safeguard critical fixed services under diverse operational conditions. Key uncertainties persist around propagation modelling accuracy, database integrity, aggregate interference management, and the ability to enforce compliance against rogue or misconfigured devices. These factors introduce significant operational and security risks, particularly for high-availability networks that demand near-perfect reliability. Until AFC proves its capability in other less-critical live environments, reliance on this system for frequency coordination in such important spectrum would be premature and potentially detrimental to incumbent services.

Key considerations for operators worldwide include:

- Protection of the PTP links of licenced incumbents is a key consideration.^{2,3} For Fixed Service (FS) links, we target availability of 99.999–99.9999%, and even extremely low probability interference events can cause outages.
- Real world and consistent use of formalised propagation and interference models by parties that may either cause interference or risk receiving interference.
- Risks of aggregated interference and device mis-behaviour.

Fade margin is a critical factor in PTP link design⁴; a single AFC miscalculation could degrade fade

² Rogers – response to “Consultation on the Technical and Policy Framework for Licence-Exempt Use in the 6 GHz Band” - SMSE-014-20-Rogers-comments.pdf (page 3)

³ Viasat – Viasat Response to Ofcom Consultation: Expanding access to the 6 GHz band for mobile and Wi-Fi services. response to question 6 (page 1 - 3)

⁴ ITU Recommendation ITU-R P.530-19: Propagation data and prediction methods required for the design of terrestrial line-of-sight systems



margins and break protection thresholds, which will result in service quality degradation and increased frequency of PTP link outages.

3.2. AFC user landscape and risk considerations

Telstra has identified the following use cases as likely candidates seeking access to AFC controlled spectrum. The risks posed by each of these varies due to the way they utilise spectrum.

3.2.1. Unlicensed point to point (PTP)

This category likely represents the lowest risk due to the use of directional antennas at both ends of the link. However, it is not well-suited for WISP or similar applications because service reliability cannot be guaranteed – the spectrum may be reclaimed by a higher-tier, apparatus-licensed primary service without prior notice. Our preference is that existing licensing mechanisms continue to be used for PTP services.

3.2.2. Unlicensed point to multipoint (PMP)

A typical example of this scenario is Point-to-Multipoint (PMP) Cambium equipment as used in the WISPAU trial,⁵ in which sectorised access points (APs) mounted at elevated locations are deployed to serve multiple subscriber units. These APs operate under an AFC-controlled regime, meaning the AFC system calculates permissible transmit power and frequency assignments for the primary access point based on its geolocation and antenna characteristics.

However, the customer premises equipment (CPE) or subscriber stations connected to these APs are not individually coordinated outside of the AFC system. Instead, their compliance relies entirely on the assumptions made during the AP's initial AFC authorisation. This introduces several technical risks, including:

- **Unverified installation parameters:** If subscriber units are installed outside the coverage area or at higher elevations than assumed, their effective radiated power and line-of-sight conditions may differ significantly from the AFC model, increasing interference risk.
- **Aggregate interference uncertainty:** While the AFC system may account for an individual AP's emissions, it does not model the combined effect of multiple APs transmitting simultaneously. This can lead to aggregate interference that AFC cannot predict or mitigate.
- **Spectrum reclamation:** Because fixed services are prioritised, spectrum temporarily allocated by AFC to an AP can be revoked without notice if a new fixed link is deployed. In such cases, all dependent client devices lose connectivity, making AFC a frustrating proposition for small WISP businesses and their customers, or for other use cases such as smart farms, tourist attractions, university or industrial campuses (see next section) where outdoor SP APs are deployed and relied upon.

⁵ [Automatic Frequency Coordination Trial and Protection of Incumbent Services in the 6GHz Band - WISPAU](#)



3.2.3. Campus access point deployments

This category is characterised by additional risk factors:

- **Installation height and elevation sensitivity**
Access points (APs) are often mounted at elevated outdoor positions - on rooftops, towers, or other high structures to maximise coverage. Any AFC system attempting to calculate permissible transmit power and interference risk must incorporate accurate elevation data, not just horizontal coordinates.
 - If elevation is misreported or omitted, propagation models can significantly underestimate interference potential, especially for line-of-sight paths to fixed links.
- **Complexity of clutter and terrain modelling**
AFC systems that include clutter data (e.g., building heights, foliage, urban density) face an additional challenge: precision in environmental modelling. Even small inaccuracies in clutter assumptions can lead to incorrect exclusion zones, allowing harmful interference to microwave receivers.
- **Aggregate interference risk**
In service areas where fixed link receivers operate, the possibility of many APs being deployed over time increases the risk of significant aggregate interference.
 - While each AP may individually comply with AFC constraints, the combined emissions from multiple APs can raise the noise floor beyond acceptable limits, degrading link reliability.
 - This is particularly problematic for high-availability microwave systems that require 99.999% availability, where even minor interference can cause degraded link performance.
- **Spectrum reclamation**
Because incumbents have priority access, AFC-controlled unlicensed spectrum can be revoked without notice. In dense deployments, this could trigger cascading service disruptions across multiple APs and their connected clients.

3.3. Aggregate in-band interference

Unlicensed AFC-controlled services, when widely deployed, pose a significant risk to incumbent licenced systems due to aggregate interference – an issue not considered by current AFC models. Deployment of multiple SP devices in a localised area, transmitting at up to 36 dBm EIRP poses a risk of aggregate in-band interference to other services operating in-band.

Even if each individual AP device complies with power and frequency limits, multiple devices transmitting simultaneously can collectively contribute to an elevated link receiver noise floor. This will have the effect of reducing the availability of the link due to a reduced fade margin.

Aggregate interference modelling remains uncertain and difficult to validate – especially when many APs are deployed.



The impact is that operators face unpredictable degradation events that AFC systems cannot anticipate or mitigate.

3.4. AFC standard power devices impacting LPI/VLP indoor users & adjacent band interference

As a leading provider of Wi-Fi-enabled routers and access points for customers using our NBN services, we are focused on ensuring that introducing SP devices in the 6 GHz band does not interfere with LPI and VLP LIPD-licensed devices. These devices play a crucial role in home and enterprise Wi-Fi applications. Given that our Wi-Fi devices located at homes and offices may also carry Triple Zero calls, this is a major concern.

LPI and VLP deployments are designed for short-range, primarily indoor environments where interference tolerance is minimal, with Telstra's NBN gateway devices falling under this categorisation. Our NBN gateway devices are not SP capable nor will they be in the future. If SP devices – often installed outdoors or at elevated positions – are allowed to operate without robust coexistence mechanisms, they could raise the noise floor or create interference scenarios that degrade performance for millions of consumer-grade devices, with our devices being disproportionately affected by SP devices. This concern is shared by other operators.^{6,7}

Maintaining a balanced ecosystem is critical. LPI and VLP services enable high-density connectivity in homes and offices, supporting everything from streaming to IoT applications. Any degradation in these services would directly affect user experience and undermine the broader benefits of 6 GHz spectrum allocation. An inherent limitation of Wi-Fi is poor interference control in heavily congested areas. Therefore, mitigation and coexistence strategies, such as strict power control, segmentation of spectrum, and clear operational boundaries, must be enforced to prevent harmful interference and preserve the integrity of LPI/VLP use cases.

Class-licensed services must be allocated spectrum in a manner that provides sufficient guard band protection to ensure the integrity of future Wireless Broadband (WBB) services in the Upper 6 GHz band. This approach is consistent with established spectrum management practices wherein unlicensed or lightly licensed users are expected to implement effective coexistence measures to prevent harmful interference with licensed systems and users. This consideration is particularly relevant for higher-power SP devices, which operate at significantly greater power levels compared to VLP or LPI devices.

Given the operational concerns surrounding AFC – including its reliance on accurate geolocation, elevation data, and complex propagation modelling – there is significant uncertainty about its ability to fully protect other licenced services and users. AFC systems do not currently account for aggregate interference from large-scale deployments of unlicensed devices, nor have they demonstrated proven performance in real-world environments. For these reasons, we argue that AFC, even if considered, is

⁶ [Vodafone UK: Vodafone Response to Ofcom Consultation: Expanding access to the 6 GHz band for mobile and Wi-Fi services, response to question 1 \(page 13\)](#)

⁷ [BT Group: BT Response to Ofcom Consultation: Vodafone UK: Vodafone Response to Ofcom Consultation: Expanding access to the 6 GHz band for mobile and Wi-Fi services, response to question 1 \(page 7\)](#)



unsuitable above 6265 MHz, where the risk to users in the Upper 6 GHz band becomes even more pronounced. Regulatory frameworks should prioritise the protection for licenced users, both current and future, and require robust guard band strategies from class-licensed services rather than relying on unproven AFC mechanisms.

3.5. Security risk - tampering

AFC systems introduce significant cybersecurity concerns that go beyond traditional spectrum management challenges. One major risk is the possibility of malicious tampering with AFC databases or control logic to deliberately cause harmful interference. If an attacker gains access to the AFC system or its communication channels, they could manipulate frequency assignments, power limits, or exclusion zones – potentially creating harmful interference to incumbent services, including critical infrastructure.

Another vulnerability is spoofing at the access point level. Malicious actors could falsify geolocation data or device credentials to trick the AFC system into granting spectrum access under false pretences. This could enable unauthorised devices to operate in protected bands, posing a direct threat to incumbent networks. Such attacks could be designed to attach to or disrupt high-value microwave links, undermining service reliability and public safety.

Preventing these exploits requires:

- robust authentication and encryption for all AFC communications;
- tamper-proof hardware and secure firmware in AFC-enabled devices;
- continuous monitoring and anomaly detection to identify suspicious patterns, such as unexpected location changes or abnormal spectrum requests; and
- regulatory enforcement and certification frameworks to ensure AFC providers implement strong cybersecurity measures.

Without these safeguards, AFC systems could become an attractive target for adversaries seeking to disrupt critical communications or exploit spectrum resources illegally.

3.5.1. AFC cannot control rogue, misconfigured, or “grey market” devices

Devices could potentially be modified, re-flashed, or configured for use in other countries, making them impossible to control within the intended regulatory framework. Rogue SP devices may never communicate with the AFC system at all, therefore not appearing in any database, or may deliberately misreport their location, further complicating oversight. When interference does occur, enforcement is typically slow, manual, and costly, often taking weeks to resolve. As a result, operators may be exposed to outages caused by devices that the AFC system cannot detect or remotely disable.



3.6. Multiple AFC controller considerations

Boundary control between multiple AFCs is problematic – for illustration, we have issues with inter-spectrum licence borders today (10-30km dead zones on 3.6 GHz as an example). Although these may be less significant for certain use cases, it is important not to underestimate the visibility of 6 GHz Wi-Fi equipment when mounted at elevation; such devices can be detected over considerable distances in free space.

Managing boundaries between different AFC systems is inherently complex and poses significant operational risks. Today, we already experience major issues at spectrum license borders – such as 10–30 km dead zones in the 3.6 GHz band – where coordination failures lead to inefficient spectrum use and service gaps. These challenges arise because propagation models and exclusion zones often fail to account for real-world variability in terrain, clutter, and antenna height.

In the context of the 6 GHz band, the problem becomes even more pronounced when Wi-Fi equipment is mounted at elevated heights (e.g., rooftops or towers). Unlike indoor deployments, outdoor installations can achieve near free-space propagation conditions, allowing signals to travel far beyond the intended coverage area. This means that even small errors in AFC boundary calculations can result in cross-border interference, impacting incumbent fixed microwave links that require extremely high reliability.

Worse, if multiple AFC systems from different vendors cover overlapping regions, it may be even more difficult to determine aggregate interference. This situation currently exists in the USA, where the FCC has approved seven distinct AFC systems run by separate operators to offer national AFC-related services.⁸ In such cases, communication between the AFC systems is necessary to calculate aggregate levels of interference to incumbent services. For an operator like Telstra, interference investigation and resolution across multiple AFC systems without a central, searchable repository would be significantly more complex.

3.7. Demand has not been demonstrated

Alternative bands are available for potential operators, such as WISPs, who wish to offer services to customers. These include AWL or apparatus-licensed bands, which provide enhanced protection for their users; notable examples are the 3 GHz and 26/28 GHz bands. To the best of our knowledge, significant opportunities remain within these frequency ranges, and their resources are significantly under-utilised.

Additionally, 5.8 GHz Wi-Fi may operate at up to 36 dBm EIRP - the same power level proposed for SP-devices in this consultation – indicating that there are existing options for operators and users seeking higher-powered Wi-Fi services.

As such, there is insufficient evidence of demand to justify the introduction of an SP power class, supported by AFC.

⁸ [FCC Announces approval of Seven 6 GHz band Automated Frequency Coordination systems for commercial operation](#)



04 Telstra views about the WISPAU trial

We have some concerns about the WISPAU trial because it may not convincingly show that AFC can work at scale. Since major incumbents are not actively participating, the trial cannot truly test coexistence in realistic scenarios with a high risk of interference. The trial also cannot demonstrate aggregate interference at scale. Therefore, the results should be seen as suggestive rather than conclusive. Larger trials that involve more industry players and use automated processes are necessary before these findings influence national policy.

4.1. Trial design and use-case definition

Telstra is concerned that ACMA's decisions about the implementation of AFC could be premature. The technology is still in development, and while it is commendable that WISPAU has started some small-scale field trials, Telstra, for one, would like to participate in real-world coexistence studies and interference testing, and see evidence that the AFC technology works with a variety of anticipated use cases referred to in Section 3.2 of this submission.

We understand that the WISPAU trial is taking place in Central Queensland near the township of Benaraby. While the scope of the trial is not visible to us, it seems that both NBN and Qld Rail do have PTP links (ACMA Licence Nos. 11551961/2 and 12850457/1 respectively) running through the trial area. Both Telstra and Optus also have PTP links in the area and are operating in the same band, however the antenna azimuths are such that it is unlikely that they would be impacted. We anticipate that both NBN and Qld Rail will have been engaged to monitor link performance throughout the trial.

Telstra respectfully suggests that further field testing be done to prove the viability of any AFC systems or algorithms. Given that the vast majority of PTP licences in this band are held by Telstra, Optus and NBN, it follows that those licensees have, on balance, a greater chance of their 6 GHz spectrum facing 'contention' from any RLAN systems likely to be deployed in the future.

If there are any future industry wide trials, Telstra would want to see the following aspects included:

- Operational interfaces / databases;
- Validate frequency coordination outcomes;
- Database security / stability; and
- Real-world interference coexistence studies and interference testing.

4.2. Lack of baseline AFC requirements for these services

Australia currently lacks a formal national standard for AFC, creating uncertainty for stakeholders. While ACMA's discussion paper explores the potential use of AFC in the 6 GHz band, there is no codified framework outlining technical requirements, interference-coordination methods, compliance processes, or governance arrangements. In the absence of such a standard, we maintain the position that not implementing AFC remains the most prudent and stable course of action. By contrast, considering AFC without a formal standard risks a fragmented implementation, inconsistent protection



of incumbents, and reduced efficiency in spectrum sharing. Establishing a national standard would be essential before AFC could even be considered as a viable option and would also enable more robust trials to properly assess its effectiveness.



05 Critical considerations prior to adoption of AFC

If the decision is taken to move forward with AFC, it is essential that critical safeguards and frameworks are in place before adoption. Introducing AFC without these measures would risk operational inefficiencies, increased compliance burdens, and potential harm to incumbent services. To avoid these outcomes, the process must include a clearly defined regulatory framework and rigorous technical standards to guarantee coexistence. Equally important is transparent governance, comprehensive audit mechanisms, and meaningful engagement with all major stakeholders to validate coexistence under real-world conditions. Without these steps, AFC could undermine confidence in spectrum management and create long-term challenges for industry and regulators alike. The decision to proceed should therefore be contingent on addressing these issues thoroughly and collaboratively.

We support the ACMA's contemplations⁹ that only part of the lower 6 GHz band be opened for AFC-controlled SP devices, if the decision is taken to move forward with AFC. We propose that AFC-controlled SP devices should be restricted to within the 5925 – 6265 MHz band at levels up to 36 dBm EIRP. This approach provides SP devices with the option to use up to one 320 MHz RLAN channel (5945 – 6265 MHz) and also enables Very Low Power (VLP) and Low Power Indoor (LPI) devices to utilise at least one 320 MHz channel (6265 – 6585 MHz), or two 160 MHz channels (etc.), without the risk of interference from neighbouring SP devices.

There is precedent for such an approach; we note that for Wi-Fi in the 5 GHz band that 4W transmit power is only available for a portion of the spectrum. Additionally, this measure would minimise the potential for adjacent band interference to future Wireless Broadband (WBB) services in the 6585 – 7100 MHz range.

Our support for part of the lower 6 GHz band being opened for AFC (if AFC is introduced) is subject to understanding more about clearance of the upper 6 GHz band and associated timelines, as this is a critical issue for our operations. We currently operate a substantial number of 6.7 GHz PTP microwave links within this spectrum,¹⁰ some of which will inevitably be relocated to the lower 6 GHz band. This transition will increase the number of licensed PTP links in the lower band, elevating the risk of interference unless robust and effective frequency coordination measures are implemented.

5.1. Licensing Mechanism

If the decision is made to proceed with AFC, we strongly recommend it is done under an AFC-controlled class licence. VLP and LPI RLAN devices are licensed under a class licence, including devices operating up to 36 dBm EIRP in the 5.8 GHz band, and we see no compelling reason to deviate from this precedent. As we have noted, incumbent services operating with primary allocation status under the Australian Radiofrequency Spectrum Plan (ARSP) require protection. A class licensing structure ensures that devices operating under it are not protected from harmful interference, nor may they cause harmful interference to other services, which makes class licensing the appropriate licence type.

⁹ Consultation paper, p.13.

¹⁰ Telstra's licence count is 588 for 6.7GHz (as of 14 January 2026)



Class licensing is also appropriate insofar as it would mean the ACMA would not need to collect licence fees, and it affords a degree of flexibility in how records of SP devices are kept – for example, full detailed records (antennas, elevation, azimuth, etc) could be kept in a publicly accessible third-party database, with more nominal details (the areas in which SP devices are permitted to operate) in the RRL.

5.2. Detailed consultation on coordination standards is required

Before any decision to implement AFC, a comprehensive and transparent consultation process on coordination standards is essential. These standards will form the backbone of coordination criteria in the Lower 6 GHz band and must address several critical areas. First, technical interoperability requirements need to be clearly defined to ensure all AFC systems operate consistently and reliably across different vendors and environments. Equally important is the protection of incumbent services through robust mechanisms, including fail-safe protocols and real-time monitoring to prevent harmful interference. A Technical Liaison Group may be a viable option to define the relevant coordination criteria; a key criterion here would be to consider all the requirements for safeguarding future WBB traffic in the Upper 6 GHz band from potential adjacent-band interference originating from AFC-controlled SP devices in the Lower 6 GHz band.

Data security and privacy must also be prioritised, with strict requirements for handling sensitive location and operational data, including encryption, access controls, and audit trails. Governance and compliance frameworks should outline responsibilities for certification, ongoing checks, and enforcement actions to maintain integrity and trust in the system. Furthermore, stakeholder engagement must be broadened to include incumbents, WISPs, equipment vendors and the ACMA, ensuring that standards reflect practical realities and balanced outcomes. Finally, alignment with international best practices – such as those adopted in Canada – will help avoid fragmentation.

Without detailed consultation and consensus on these standards, AFC risks introducing uncertainty, operational inefficiencies, and potential disputes over spectrum access. This process should be prioritised and completed before any formal rollout.

5.3. Avoiding interference with licenced incumbents in the L6 band

Licensed incumbents in the 6 GHz band (PTP links and satellite earth stations) depend on predictable interference environments to provide critical services. To safeguard this environment, any SP device managed by a FC or AFC environment should conform to exclusion zones, adjacent-band interference masks, real-time AFC validation before device activation and enforcement mechanisms to ensure compliance (e.g. remote device deactivation).

Introducing standard-power RLAN devices (especially outdoors) into L6 without having robust coordination criteria can cause:

- **Co-channel interference:** Direct overlap with frequencies used by licensed incumbents.



- **Adjacent-channel leakage:** Imperfect filtering in RLAN devices can spill energy into adjacent channels and/or bands.
- **Aggregate interference:** Multiple low-power devices collectively raising the noise floor.

Mitigating factors include exclusion zones, conservative power and height limits, ensuring RRL and AFC database integrity and a strong governance and enforcement framework.

5.4. Interference tracing

As incumbents, it is essential that we have access to comprehensive information to effectively identify and address unexpected interference. Establishing a centralised repository of AFC-controlled SP devices (at a minimum) will greatly assist in identifying and addressing interference sources affecting mission-critical transmission links.

5.4.1. Interference detection and resolution is slow and costly

Incumbent operators would agree that investigations into interference are highly resource-intensive and operationally challenging. They require deploying specialised field teams equipped with spectrum analysers, truck rolls, and coordinating across multiple sites. Identifying a single rogue RLAN access point among thousands of devices in dense deployments will be extremely difficult and often impractical without precise location data. Furthermore, AFC system logs, while useful for general oversight, may lack the granular detail needed for rapid attribution and root-cause analysis, leaving operators with limited actionable insights.

The consequences of these limitations are significant. Network outages caused by interference can persist for days or even weeks, disrupting critical services and eroding customer confidence. Extended downtime not only impacts end-user experience but also imposes substantial operational costs on providers. Without robust coordination standards and enhanced diagnostic capabilities, these challenges will continue to undermine the reliability and efficiency of shared spectrum environments.

5.5. AFC and population of the RRL and other database(s)

We do not foresee significant changes to the RRL as used in its current form – it should continue to populate the details of licenced transmitters as it is doing today. We do however emphasise that the quality of the data contained in the RRL is key since it would be used to derive exclusion zones for AFC-controlled SP devices.

In addition, we recommend the establishment of a central database, publicly accessible, that should store the details of all AFC-controlled SP devices. Stakeholders should be permitted to query this database to aid in interference investigations. It will be crucial to keep this database updated with correct information and to perform regular audits to ensure the integrity of the data contained. Please see Question 10 in the Appendix for more information.



5.6. Accuracy of underlying databases is critical

Effective protection of PTP microwave links relies on several critical technical parameters. Accurate path geometry is essential to model the physical route between transmitter and receiver, ensuring that potential interference zones are well understood. The heights and azimuths of antennas must be precisely specified, as these factors determine the coverage area and the likelihood of interference with other systems. Additionally, receiver sensitivity and fade margins are crucial for maintaining robust link performance, particularly in the face of environmental changes or weak signal conditions. Finally, correct frequency and channelisation data are necessary to ensure that each link operates within its assigned spectrum, minimising the risk of overlap and interference with other users.

Accurate and up-to-date information is essential for Telstra to perform reliable interference modelling and calculations. Currently we query the RRL for information on licenced transmitters. If any of the necessary data is missing, outdated, or incorrect, the resulting analysis will be flawed. Furthermore, for Telstra to be aware of AFC-controlled devices and their potential interference risk, we would need to access a central database containing accurate particulars for AFC-controlled SP devices.

This challenge is equally relevant for AFC operators; without access to precise and current information, or if the data used in decision-making is incomplete or erroneous, the AFC system may be unable to determine appropriate exclusion zones and could fail to adequately protect licensed point-to-point links. Therefore, any AFC system would need to have access to both the RRL as well as the central database containing details of AFC-controlled SP devices (including those of other AFC-controlled networks, if they are geographically close).

To reduce the risk of such issues, it is crucial to conduct regular audits of the RRL as well as the database that holds details of AFC-controlled elements.

5.7. Future band capacity demands

It is expected that traffic in the L6 band will increase, caused by migration of 6.7 GHz PTP microwave links to the lower 6 GHz band, as well as the increase of Wi-Fi 6E/7/8 devices, leading to less than perfect access for AFC-controlled class licence devices. Feedback from the USA provides useful insights: Tarana Wireless notes regarding unlicensed 6 GHz operation in the USA using AFC, specifically targeting rural and underserved areas, that AFC often delivers non-contiguous or reduced channel availability, requiring adaptive channelisation rather than full 160 MHz channels, with only 30% of locations in rural America having enough 160 MHz channels to support up to 2 operators in the same market. 48% of suburban and 42% of urban locations face the same issue.¹¹

This is not a failure of AFC but an early indication of real-world constraints in non-ideal deployment geometries. AFC can support service delivery, but it frequently imposes operational limitations that must be factored into planning and design.

¹¹ [6GHz Fixed Wireless: How Tarana G1 Solves Congestion for Rural WISPs](#)



5.8. Upper 6 GHz band risks

The boundaries and guard bands for Wireless Broadband (WBB) allocations in the Upper 6 GHz spectrum band have not yet been finalised in consultation with industry stakeholders. Proceeding with the deployment of AFC systems before these boundaries and associated licensing arrangements are fully resolved would be premature and could lead to regulatory and operational complications. It is essential that the final WBB boundaries are established through a transparent and collaborative process, ensuring that all industry concerns are addressed and that spectrum allocations are optimised.

5.9. Adjacent-band interference between AFC in L6 and future WBB in U6

Adjacent-band interference could occur in the future if AFC-controlled SP Wi-Fi devices using the 6 GHz band leak energy into adjacent U6 channels used by licensed operators, especially with high-power SP devices rather than low-power VLP or LPI devices.

To safeguard a possible future allocation of WBB in U6, we propose segmentation be adopted when it comes to SP devices:

- Limit SP RLAN/Wi-Fi devices to 5925 – 6265 MHz under strict AFC control.
- Keep 6265 – 6585 MHz as VLP (14 dBm) / LPI (24 dBm) only to provide a protected 320 MHz channel space to these non-AFC devices and to provide a buffer for U6 IMT devices.

5.10. Impact of multiple AFC systems

If multiple AFC systems are to be implemented, our strong preference would be to limit their number. The presence of several AFC operators and systems increases complexity and the risk of inconsistent decision-making, which can lead to inefficiencies and a heightened likelihood of interference. Each AFC operator may maintain its own database of users and devices, but without visibility into the records of neighbouring AFC operators, there is a significant risk of interference - not only between AFC-managed systems themselves but also with licensed incumbents. To address these challenges, options could include establishing a single authoritative licensing database, such as the RRL, alongside a central repository containing details of all AFC-managed SP devices and adopting standardised protocols for data exchange between AFC systems.

The ACMA has also discussed the possibility of delivering AFC systems on a geographic regional basis. However, this approach also introduces additional complexity in managing the boundaries between competing AFC providers. For example, in current spectrum licensing for the 3.6 GHz band, boundary setbacks can vary from 10 to 30 kilometres, even within synchronised network environments. If AFC systems are required to coordinate unsynchronised TDD transmitters, poorly managed boundaries could result in significant areas where AFC services must be excluded, further reducing spectrum efficiency and complicating coordination efforts.



Appendix 1: Response to consultation questions

This appendix contains our response to the questions raised in the discussion paper.

Question 1

Do you support the adoption of an AFC framework in Australia to enable outdoor standard-power operation in the 6 GHz band? What are the key benefits and concerns? In particular, who would the main beneficiaries be, and what would be the implications for consumers in the telecommunications market?

Telstra does not support the introduction of an AFC framework into Australia to support expansion of Wi-Fi 6GHz services for multiple reasons.

- 1) We believe the value of dynamic spectrum is overstated, since reallocating 6.7 GHz to WBB services will boost fixed network demand for the 6.1 GHz band and limit spectrum available to Standard Power (36 dBm EIRP) 6 GHz Wi-Fi devices.
- 2) The uncertainty of access is likely to dissuade use by groups such as Wireless ISPs, who also have access to a sizable amount of spectrum in other bands with greater certainty (such as under AWL licence models). This may leave the only group to benefit being the campus/industrial complex coverage type scenarios, which we believe will bring with it the highest risk of causing interference.
- 3) As a prospective provider of Wi-Fi 6 GHz access points for in-home internet distribution, we are concerned that increasing power levels for Wi-Fi operation in the 6 GHz band may compromise our ability to recommend this spectrum for dependable residential use. This concern arises from the potential for nearby SP access points to generate interference at levels that could render Wi-Fi 6 GHz services for LPI and VLP devices to be unreliable.
- 4) The system architecture presents a security concern due to the possibility that an AFC could be exploited to intentionally disrupt incumbent links. This represents an inherent risk associated with any AFC implementation.
- 5) The principal risk associated with this technology is the potential to inadvertently or, in the worst case, maliciously interfere with tier 1 telecommunications providers operating carrier-grade PTP links. Such interference could jeopardize the reliability of Triple Zero emergency calling traffic transmitted over these connections. Given the increased focus on the resilience of Triple Zero services, any factor that may compromise this critical infrastructure warrants thorough evaluation. If the technology is adopted, it is essential that fixed link incumbents have efficient mechanisms to promptly identify sources of interference for timely resolution.

Question 2

How might AFC change the way WISPs and other communications service providers operate, particularly in terms of supporting greater spectrum efficiency or service innovation?

Key aspects that participants in the telecommunications industry (including WISPs) require when seeking access to spectrum include:



- Certainty and continuity of access to spectrum
- Sufficient quality of spectrum (i.e. free of harmful interference)

These 2 requirements are fundamental when it comes to being able to offer a product to a customer. Those requirements then drive a long-term commitment to hardware, site deployments and service provision.

Given these fundamental requirements for every telecommunications infrastructure provider, Telstra raises questions about the real value of AFC to WISPs and, consequently, the potential positive and negative effects it might bring.

It is necessary to break AFC into its two components:

- a) Automation, and
- b) Frequency Coordination

Automation will not ensure spectral efficiency – although it may make decisions in terms of frequency coordination quicker than traditional Frequency Coordination (FC) methods. Spectral efficiency comes from the nature of the coordination rules employed to determine acceptable levels of interference. In this band in particular, that benchmark is very high, given that tier 1 telecommunications carriers need to carry Triple Zero traffic on these links.

From a WISP perspective, that speed of allocation may initially be positive, however in the operational world proposed by ACMA, an allocation can be withdrawn as fast as it is allocated should the spectrum be required for Tier 1 point to point links. This flies directly in the face of what a WISP needs from spectrum assignments to deliver a service. Given the nature of a WISPs business model, one would reasonably expect they would prefer AWL allocated spectrum in the 3.8 – 4.2 GHz band to temporary automated allocations in the 6.1 GHz band that will diminish in accessibility over time as 6.7 GHz point to point services migrate into the band.

Ultimately, if the primary user case the ACMA is targeting is WISPs, then the whole of business WISP model is unlikely to find any system that only offers temporary allocations palatable.

Question 3

Are there any alternatives to AFC that could support dynamic and efficient frequency assignments in the 6 GHz band?

Telstra's initial response is to reaffirm whether key stakeholders in the telecommunications industry are indeed seeking a dynamic spectrum environment that lacks the certainty required to support network infrastructure investment. Therefore, it is worth considering whether the appropriate question is being posed in this context.

We anticipate that a particular segment – namely campus-wide or industrial complex outdoor deployments of SP Wi-Fi 6 GHz access equipment - would benefit significantly from more dynamic allocation. These networks are typically configured as mesh-based systems to deliver coverage across extensive, defined areas such as university or school campuses. Currently, this user group primarily utilises LIPD Class licensed public Wi-Fi band infrastructure operating with 2.4 GHz and 5.8 GHz spectrum.



Having access to a system that can dynamically and quickly assign access frequencies for such deployments could potentially be useful, although to be clear the only additional “efficiency” such a system brings is a reduction in human effort in conducting the frequency coordination assessment. Manual frequency assignment, we believe, is just as capable of delivering an efficient assignment of frequencies from a spectrum domain perspective. When the overhead costs associated with the provision and security of actual AFC platforms is included, the value of automation is further diminished.

Question 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?

Should an AFC system be deployed in Australia, then Telstra’s view is that the model deployed in Canada is the most appropriate for Australian conditions, particularly considering comparisons between our remote areas and similar environments in Canada. We consider that the Canadian model provides significantly stronger safeguards for incumbents than the equivalent system that has been established in the USA.

Question 5

How much spectrum should be made available under AFC, and what bandwidths should be allocated to support individual AFC service offerings? Should part or all of the 6 GHz spectrum available for RLAN use be made available for AFC-enabled access by standard power devices, or is there a case for arrangements supporting a range of power levels above VLP/LPI and below/including standard power?

We propose that AFC should be restricted to managing Standard Power (SP) RLAN/Wi-Fi devices operating within the 5925 – 6265 MHz band (which allows for a 320 MHz wide channel) at levels up to 36 dBm EIRP. We do not support its use across the entire band of 5925-6585 MHz as we believe it will be important to preserve at least one 320 MHz channel, or two 160 MHz channels, purely for indoor and low power applications to support delivery of internet services within the home. As a leading provider of Wi-Fi-enabled routers and access points for customers using our NBN services, and given that these non-AFC VLP/LPI devices may also carry Triple Zero calls, it is important that these devices be given a certain level of protection. This segmentation approach will also assist in ensuring that future guard band protection of Wi-Fi, is the responsibility of the Wi-Fi band users and not the adjacent WBB users who will be purchasing their spectrum under auction conditions above 6585 MHz.

We do not support the use of AFC systems for WBB networks. WBB network deployments require certainty of spectrum access in order to justify the capital investment required to roll out these systems. As such, we see nothing to be gained by using AFC within the future Spectrum-licensed spectrum between 6585-7100 MHz.

A further concern is that the ACMA is considering AFC in the 6585-7100 MHz sub-band outside of what they believe will be the required geographic areas for WBB deployments under spectrum licensing. At this time, our position is that we ask the ACMA to refrain from any AFC considerations above 6585 MHz until the full arrangements for the WBB allocation, including defining those geographies where spectrum licencing will be allowed, have been agreed with industry.

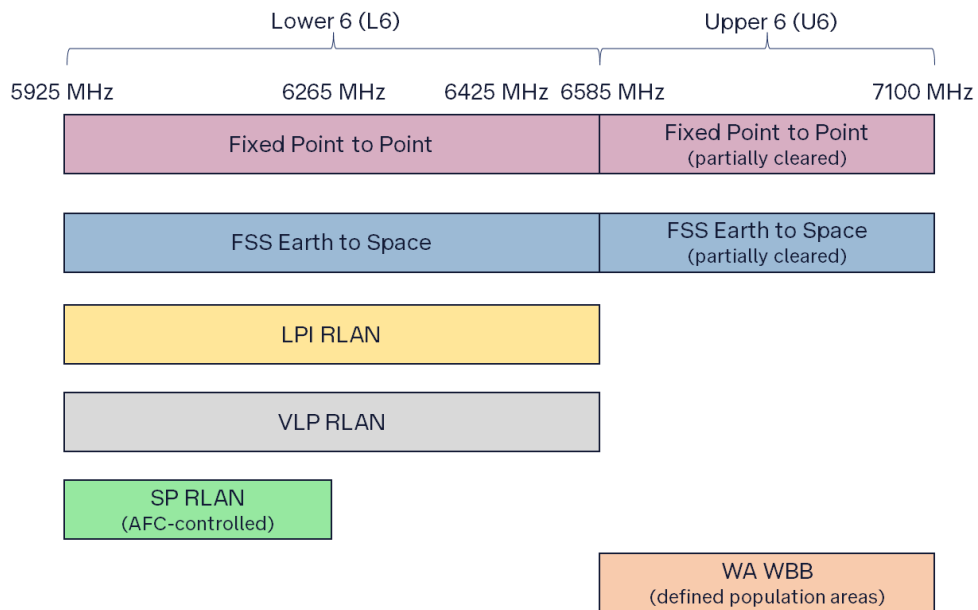


Figure 1: Graphical Representation of Services in 6 GHz Band (Future View)

**Question 6**

What degrees of geographic and spectrum segmentation should be considered when planning for individual AFC system deployments? For example, would planning for localised, self-contained areas or multiple sub-bands foster competition in the market for the provision of AFC services, or would that come at too much of a cost to spectrum efficiency (through the need for guard bands/spaces)?

Telstra's long-term experience in managing spectrum borders under spectrum licences has shown that both geographic and frequency domain boundaries are generally inefficient uses of the spectrum.

Geographic borders are only practical without generating spectrum waste where usage has declined to very sparse levels generally in remote parts of the continent. For maximum efficiency, should an AFC system actually be deployed, we can only recommend that areas no smaller than perhaps State or Territory border level be contemplated for different AFC providers.

Frequency domain borders while not an issue for FDD technologies, are very problematic for TDD technologies where networks are operating unsynchronised. In the case of the types of use being proposed, the lack of reliable inter-network synchronisation should rule out frequency domain segmentation of AFC control systems alone. In addition, segmenting the spectrum across different AFC providers in the frequency domain can only lead to a less efficient allocation, given a subscription to one AFC will only gain a user part of the available spectrum. This additional overhead of having to compare and select the best AFC provider in a location drives inefficiency into the business side of the equation as well as in the spectral efficiency domain.

Telstra ultimately supports an approach that prioritises spectrum efficiency and operational simplicity over segmentation-driven competition. While geographic or spectrum segmentation could theoretically foster market diversity at an economic level, physics will ultimately determine what is realistically possible in ways that do not create regions of spectrum denial.

Question 7

What are the respective roles and responsibilities for industry and government in realising an AFC regime? Should AFC be operated by industry under government-set rules or should government play a more direct role in providing AFC services?

Given the security and sovereign risks associated with AFC systems being vulnerable to cyber-attacks – which could potentially be exploited to initiate malicious actions against fixed network spectrum users - it is prudent to consider government oversight for AFC system operations. Government control would also facilitate the provision of timely and accurate information regarding active transmitters during live interference events.

**Question 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?

Any AFC system must perform the frequency coordination part of the work either in alignment with the existing rules in the respective RALIs issued by ACMA, or where a particular use case is not currently considered, then new frequency coordination standards needs to be developed by ACMA in consultation with industry, that ensure frequency coordination protection for incumbent users is not compromised.

Given that we are advocating for AFC controlled Wi-Fi 6GHz SP devices to remain under class licensing, the recording of where devices are and what they are doing may not end up in the RRL database, but they do need to be made publicly available in a timely fashion through a system controlled by the regulator.

The RRL does play a source data role in any AFC application for identification of where incumbent links are located and how they are configured. It will be important that the incumbent services validate their data in RRL prior to any AFC going live, so that they can indeed be afforded the protections they are entitled to as per the Radiocommunications Act.



Question 9

What is the need for, and potential structure of, a tiered access model for incorporating standard power RLAN devices in the 6 GHz band?

We are in favour of a clear tiered access model if AFC is introduced, especially considering our feedback to question 5.

5925 to 6265 MHz

- Tier 1 – Incumbent apparatus-licenced users (existing)
- Tier 2 – Standard Power (SP) (LIPD class) devices under control of an AFC system (new) and VLP and LPI (LIPD class) devices not under AFC control (existing)

6265 to 6585 MHz

- Tier 1 – Incumbent apparatus-licenced users (existing)
- Tier 2 – VLP and LPI (LIPD class) devices not under AFC control (existing)

6585 to 7100 MHz (today)

- Tier 1 – Incumbent apparatus licenced users

6585 to 7100 MHz (future – within defined population areas¹²)

- Tier 1 – WBB/IMT spectrum-licenced devices

6585 to 7100 MHz (future – outside defined population areas)

- Tier 1 – Incumbent apparatus-licenced users

Question 10

With respect to licensing, should individual AFC-coordinated devices be registered on the RRL or covered by broader system-wide licensing arrangements, or are there other authorisation models that we should consider?

We are of the view that first and foremost, the devices be operated under AFC within the existing Low Interference Potential Devices (LIPD) Class licence, to avoid any confusion regarding their rights to the spectrum and any complexities with AFC allocations being automatically withdrawn once a new fixed link incumbent requires access to the spectrum.

¹² Exact definition of “defined population areas” yet to be defined



Records of all AFC approved devices need to be made available through a suitable government-controlled central database to continue to enable our requirements for interference source identification and resolution work should something go wrong with an AFC controlled device.

Question 11

What processes and safeguards would need to be established to accredit, audit and ensure ongoing compliance of industry-led AFC operators? What type of rules should be imposed on prospective AFC operators and how should those rules be codified?

While not being supportive of the cost-benefit of AFC, should AFC be implemented we support the establishment of a prescriptive national standard to which all AFC systems and operators should adhere. This standard should outline comprehensive technical requirements for AFC implementations, address audit and compliance processes, define data governance protocols, and include robust fail-safe mechanisms for system outages. Additionally, it should reinforce compliance measures and minimise risks to data integrity.

It is essential to thoroughly address potential interference issues and outline the dispute resolution process to safeguard existing licence holders and their licences.

Question 12

What technical or administrative features (e.g., real-time geolocation, exclusion zones, device registration, database accuracy and latency) will be critical to the successful implementation of AFC?

We see the following aspects as important to the successful operation of an AFC environment: establishment of:

- Exclusion zones (licenced PTP microwave, licenced satellite earth stations and radioastronomy sites),
- geolocation (including height) of AFC-controlled Access Points as well as Client Devices,
- registration and authentication of client device to AFC system,
- determination of frequency use and power levels by ingestion of accurate RRL and central database containing AFC-managed SP devices,
- determination of frequency use and power levels by standardised propagation models and terrain/elevation/vegetation data,
- SP devices to power down automatically if they have been unable to contact the applicable AFC system for more than 24 hours,
- revocation of AFC-controlled client devices where applicable, and
- international standard/framework outlining all the critical aspects needed for a successful deployment.

**Question 13**

How should data integrity, ownership, and update mechanisms be managed in AFC systems? Are ACMA's existing systems (such as the RRL) sufficient, or would changes or new systems be required to support real-time coordination?

Given the lack of class licensing in the RRL at this time, we see that there would likely need to be a system brought into being to record the information of these AFC controlled class licenced devices; we propose that this should be a central national database containing the information of all AFC-managed devices.

Data integrity of all AFC-related entries should be audited periodically; this is relevant for the RRL as well as for the proposed central national database – please see Question 8 for more detail.

Regarding update mechanism and protocols – we would expect to see appropriate secure interfaces for non-real time, periodic updates (e.g. SFTP) or via secure APIs for near-real-time updates and coordination.

Question 14

What is the expected market for the provision of AFC services in Australia?

Telstra does not support the introduction of AFC in Australia, noting the reservations outlined in our submission. Further detail is provided in our responses to questions 1, 2 and 3.

Question 15

What standards or other mandatory specifications should be prescribed to ensure AFC-enabled devices comply with operational rules (for example, GPS accuracy, firmware requirements, revalidation intervals)? What are the implications for manufacturers and operators?

We believe that any AFC-enabled device should comply with the requirements set out in an appropriate national standard. The operational rule examples mentioned in this question are relevant, and we anticipate that a suitable standard - similar in approach to ISSED's DBS-06¹³ – would incorporate these requirements along with others. A suitable standard would be one that is based on widely implemented international implementations to avoid proprietary solutions that could lead to vendor lock-in.

¹³ [ISSED DBS-06](#)