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VIA ELECTRONIC FILING AT [Online submissions](#)

The Manager
Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78
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Re: **Automatic Frequency Coordination-Assisted Spectrum Sharing in the 6 GHz band - Discussion Paper**

Dear Colleagues,

Wi-Fi Alliance is a global industry association representing over 900 leading technology companies across the wireless connectivity ecosystem. We welcome the opportunity to contribute to the Australian Communications and Media Authority's consultation on the potential introduction of an Automatic Frequency Coordination (AFC) framework for the 6 GHz band ("Discussion Paper"). In the Discussion Paper, the ACMA appropriately recognizes the increasing importance of the 6 GHz spectrum as a critical resource for next-generation wireless technologies, including Wi-Fi 7 and beyond, and the need to balance expanded access with the protection of incumbent services. The exploration of AFC — a dynamic, database-driven coordination mechanism that has already been implemented in leading jurisdictions such as the United States and Canada — represents a constructive step towards enabling efficient, higher-power outdoor operations while managing harmful interference risks. We support efforts to realize greater spectrum efficiency, innovation and connectivity benefits for industry and consumers, particularly in underserved and regional areas, and offer the following views on the technical, regulatory and operational considerations outlined in the paper.

The questions set out in this Discussion Paper raise important considerations regarding spectrum efficiency, protection of incumbent services, market structure, and the long-term role of license-exempt technologies in Australia's communications ecosystem. In the responses below, we address each issue in turn, drawing on international experience with AFC deployments, established technical standards, and the demonstrated economic and social benefits of expanded 6 GHz access. Our comments are intended to support an outcome that promotes innovation, competition, and connectivity—particularly for enterprises, regional and remote users, and new service providers—while ensuring robust, transparent, and enforceable safeguards for incumbent operations.

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 be the main beneficiaries be, and what would be the implications for consumers in the telecommunications market?

Answer: Yes, Wi-Fi Alliance supports the adoption of an AFC framework in Australia to enable outdoor standard-power operation in the 6 GHz band, subject to appropriate safeguards to protect incumbent services. AFC represents a proven, proportionate and technically robust approach to spectrum sharing that enables more intensive and efficient use of the 6 GHz band without requiring exclusive licensing or reallocation of spectrum.

The primary benefit of AFC is that it allows higher-power outdoor RLAN operations while dynamically protecting fixed incumbent users—particularly fixed point-to-point services—through automated, location-aware frequency coordination. By enabling standard-power operation where and when it is feasible, AFC significantly expands the utility of the 6 GHz band beyond indoor and very-low-power use cases, supporting wider coverage, higher capacity, and more reliable performance for outdoor and campus-scale deployments.

The main beneficiaries of an AFC-enabled framework would include wireless internet service providers (WISPs), enterprises, utilities, education and healthcare campuses, transport hubs, and regional and remote communities where fiber deployment may be limited or uneconomic. These users stand to benefit from access to wide, contiguous channels that support high-throughput, low-latency connectivity using readily available Wi-Fi technologies. Equipment manufacturers and the broader innovation ecosystem would also benefit from regulatory alignment with major markets, enabling economies of scale and faster availability of compliant devices in Australia.

For consumers, the implications are broadly positive. Expanded use of standard-power 6 GHz Wi-Fi can increase competition in broadband access markets, particularly by enabling alternative last-mile and fixed wireless solutions that complement existing mobile and NBN services. This can place downward pressure on prices, improve service quality, and support differentiated offerings tailored to local conditions. Importantly, these benefits can be realized without compromising incumbent protections, provided AFC rules are conservatively designed, transparently administered, and subject to ongoing oversight.

Key concerns relate primarily to implementation rather than principle. These include ensuring the accuracy and integrity of the licensing databases such as the ACMA's Register of Radiocommunications Licences (RRL), establishing clear accountability for AFC operators, and avoiding unnecessary complexity or fragmentation that could undermine spectrum efficiency or increase compliance costs. International experience demonstrates that these risks can be effectively managed through well-defined technical rules, industry-led AFC operation under regulator-set conditions, and strong audit and enforcement mechanisms.

On balance, the adoption of AFC offers Australia a pragmatic pathway to unlock the full potential of the 6 GHz band for consumers and industry alike, while maintaining high levels of protection for existing services and aligning Australia's spectrum framework with global best practice.

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?

Answer: The introduction of an AFC framework would materially change the way WISPs and other communications service providers plan, deploy, and operate networks in the 6 GHz band, primarily by enabling predictable access to higher-power, wide-bandwidth channels on a dynamic and location-specific basis. This would allow providers to move beyond the current constraints of indoor or very-low-power use and to design outdoor networks with greater reach, reliability, and capacity. From a spectrum efficiency perspective, AFC enables far more intensive reuse of the 6 GHz band than static or conservative exclusion-based approaches. By calculating permitted frequencies and power levels in real time based on device location and incumbent protection requirements, AFC allows multiple operators to operate in close geographic proximity while minimizing harmful interference. This dynamic coordination supports higher aggregate throughput per MHz and avoids the underutilization that typically results from blanket power limits or large, static guard zones. For WISPs in particular, AFC could significantly improve the economics and performance of fixed wireless access and point-to-multipoint services, especially in regional, rural, and suburban areas. Access to standard-power 6 GHz channels would allow WISPs to deploy fewer sites to cover larger areas, use wider channels to deliver higher peak and sustained speeds, and offer more consistent quality of service compared to operation in congested lower-frequency unlicensed bands. This, in turn, supports business models that are competitive with licensed-spectrum alternatives while retaining flexibility and lower barriers to entry characteristic of license-exempt access. AFC also enables service innovation by supporting new deployment models, including outdoor enterprise networks, private and community broadband systems, smart infrastructure, and campus-scale connectivity for education, healthcare, utilities, and transport. Service providers could dynamically adapt channel assignments and power levels as network demand evolves, rather than relying on static spectrum planning assumptions. This flexibility is particularly important for supporting emerging applications that require high capacity and low latency but do not justify exclusive spectrum licensing. Overall, AFC would allow WISPs and other providers to operate with greater technical certainty, improve spectrum utilization, and develop more diverse and innovative service offerings, while continuing to share the band responsibly with incumbent users.

Question 3. Are there any alternatives to AFC that could support dynamic and efficient frequency assignments in the 6 GHz band?

Answer: Several mechanisms can support dynamic and efficient spectrum sharing in the 6 GHz band, and many of these already play an important role in enabling coexistence among license-exempt technologies. In particular, contention-based protocols such as listen-before-talk (LBT) is a foundational feature of Wi-Fi that has been highly effective in facilitating fair and efficient sharing

among large numbers of devices in congested environments, and it will continue to be a critical component of 6 GHz operations.

However, while LBT is well suited to managing coexistence, it is not designed to provide deterministic protection for certain classes of incumbent services in the 6 GHz band, such as highly directional fixed network links. These services may be geographically sparse, highly directional, or operate intermittently, which can limit the ability of device-level sensing alone to reliably characterize interference risk across space and time. For standard power outdoor deployments, LBT is most effective when complemented by additional coordination mechanisms rather than relied upon as the sole means of protection.

Other alternatives, such as static exclusion zones, indoor-only deployments, conservative power limits, or administratively assigned frequency blocks, could also be used to manage coexistence, but these approaches tend to trade spectrum efficiency and flexibility for simplicity. They are typically designed around worst-case assumptions and can leave significant portions of the band unused, particularly in areas where incumbent operations are limited or absent.

By contrast, AFC builds on existing sharing mechanisms, including LBT, by adding a location-aware, database-driven layer of coordination that enables higher-power outdoor operation where it is demonstrably feasible. Real-world experience in other countries suggests that AFC is most effective when viewed not as a replacement for established Wi-Fi coexistence techniques, but as a complementary tool that enables more intensive and efficient use of the 6 GHz band while maintaining appropriate protections for incumbent services.

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?

Answer: Yes, established AFC models implemented in other jurisdictions—particularly in the United States and Canada—provide a strong and practical foundation that would be broadly appropriate for the Australian radiocommunications environment, subject to calibration to reflect local incumbent use and regulatory frameworks.

The US and Canadian approaches demonstrate that industry-operated AFC systems, authorized under regulator-defined technical rules, can enable standard-power operation in the 6 GHz band while providing a high degree of protection for incumbent services. These models are the result of extensive technical studies, stakeholder engagement, and early operational experience, and therefore offer a lower-risk pathway for implementation in Australia compared to developing a bespoke framework from first principles.

Also, international spectrum harmonization is a particularly important consideration in the 6 GHz band. Aligning Australia's framework with jurisdictions that permit access across the full 6 GHz range would maximize the benefits of AFC by supporting access to large, contiguous blocks of spectrum. Such harmonization enables global equipment ecosystems, reduces device and deployment costs, accelerates time-to-market, and supports the use of wider channel bandwidths

that are essential for high-capacity Wi-Fi deployments. Partial or overly constrained access to the 6 GHz frequency band significantly dilutes these benefits.

In summary, an AFC framework that closely aligns with established models and supports harmonized access to the full 6 GHz band, while allowing for targeted Australian-specific adaptations, would best promote efficient spectrum use, regulatory certainty, and strong consumer and industry outcomes.

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?

Answer: To maximize the benefits of AFC and ensure efficient use of the 6 GHz band, a substantial portion—and ideally the full 5.925–7.125 GHz range available for RLAN use—should be made accessible to AFC-enabled standard-power devices, subject to appropriate incumbent protection requirements. Limiting AFC to a narrow subset of the band would significantly reduce its commercial viability and dilute the economic and technical benefits associated with higher-power outdoor operation.

Access to large, contiguous blocks of spectrum is critical for supporting modern Wi-Fi technologies, which are designed to operate most efficiently using wide channel bandwidths (for example, 160 MHz, 320 MHz and beyond). These wider channels enable higher throughput, lower latency, and improved spectral efficiency, particularly in outdoor, campus-scale, and fixed wireless deployments. An AFC framework that supports such bandwidths across a broad swath of the 6 GHz band would better align with advanced use cases and global equipment ecosystems.

There is a strong case for allowing AFC-enabled standard-power access across the 6 GHz spectrum range, rather than segmenting the band rigidly by power class. Artificial segmentation risks creating stranded spectrum, increasing complexity for device manufacturers and operators, and undermining harmonization with major markets. Where incumbent protection necessitates restrictions, AFC's dynamic, location-specific coordination is well suited to managing those constraints without resorting to blanket exclusions. That said, the framework could support a range of power levels above VLP/LPI and up to standard power, provided these are implemented coherently and do not introduce unnecessary fragmentation. Any differentiation in power classes should be driven by clear technical objectives—such as protecting incumbents in specific geographic areas—rather than by fixed sub-band allocations that reduce overall spectrum efficiency.

In summary, making a significant portion—and preferably the full—5.925–7.125 GHz band available for AFC-enabled standard-power operation, with support for wide channel bandwidths, would best promote spectrum efficiency, harmonization, and high-value use cases for consumers, enterprises, and service providers.

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)?

Answer: When considering geographic and spectrum segmentation for AFC system deployments, it is important to prioritize overall spectrum efficiency, economies of scale, and equipment commonality, as these factors are fundamental to the success of license-exempt technologies such as Wi-Fi. Excessive segmentation—whether by geography, sub-band, or deployment zone—risks undermining these benefits and could introduce unnecessary complexity without delivering commensurate gains.

License-exempt ecosystems rely on globally harmonized technical rules and large-scale equipment circulation to drive down costs, support rapid innovation, and ensure broad device availability. Planning AFC deployments around large, contiguous spectrum blocks and nationally consistent rules best supports these objectives. Fragmentation of the band into multiple localized areas or narrowly defined sub-bands would reduce the addressable market for equipment, complicate device certification, and limit the ability of manufacturers and service providers to take advantage of international scale.

From a spectrum efficiency perspective, segmentation can also impose real costs. The need for guard bands or coordination buffers between segmented areas or sub-bands reduces usable spectrum and can limit the availability of wide channels that are essential for high-capacity applications. These inefficiencies would be particularly detrimental in the 6 GHz band, where the value of the spectrum lies in its ability to support wide-bandwidth, high-throughput operation. Competition in the market for AFC services can be supported without resorting to spectrum or geographic fragmentation. Experience in other jurisdictions demonstrates that multiple AFC operators can coexist within a common national framework, operating over the same spectrum under uniform technical and regulatory rules. This approach preserves spectrum efficiency while allowing competition to occur at the service and implementation level rather than through artificial partitioning of spectrum resources.

Accordingly, we consider that a nationally consistent AFC framework, with minimal geographic or spectrum segmentation and support for large contiguous spectrum blocks, would best promote efficient spectrum use, strong competition, and the benefits of equipment commonality and global circulation.

Question 7. What are the respective roles and responsibilities for industry and government in realizing 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?

Answer: AFC is best implemented through an industry-operated model established under clear, regulator-defined rules and oversight. Under this approach, government sets the policy objectives,

technical parameters, and compliance requirements, while accredited industry operators are responsible for the day-to-day provision and operation of AFC system services. This division of roles mirrors the approach taken in Canada and the United States, leveraging the complementary strengths of government and industry. Government's role should include defining the regulatory framework for AFC, specifying incumbent protection criteria, approving technical standards, accrediting AFC operators, and maintaining robust audit and enforcement mechanisms. Government is also well placed to ensure transparency, consistency, and long-term regulatory certainty, as well as to manage interactions with incumbent licensees and broader spectrum policy objectives.

Industry, in turn, is best positioned to design, deploy, and operate AFC systems in a scalable, resilient, and innovative manner. Industry-led operation allows AFC services to evolve alongside technology and market needs, supports competition among AFC providers, and avoids the cost and inflexibility that could arise from a centrally operated government system. It also enables the rapid incorporation of software updates, performance improvements, and interoperability enhancements, which are essential for managing large numbers of devices in dynamic environments.

An important element of this model is the establishment of clear, enforceable processes for receiving, investigating, and acting on reports of potential harmful interference. Accredited AFC system operators should be required, as a condition of approval, to participate in and implement a defined interference response framework, including timely investigation, coordination among operators, and corrective action where necessary. This provides confidence to the ACMA and incumbent users that concerns will be addressed efficiently and transparently.

Experience offers a useful reference point. In the United States, Wi-Fi Alliance has facilitated a centralized [6 GHz AFC Systems Interference Reporting Portal](#) that provides an efficient, single point of entry for fixed microwave service licensees and certain radio astronomy observatories to report potential harmful interference events. Information submitted through the portal is shared automatically with all FCC-approved AFC system operators and the Federal Communications Commission, including the Enforcement Bureau. Access to the portal is restricted to authorized users of the 6 GHz band, ensuring appropriate use and data integrity. This model demonstrates how industry-led mechanisms, operating under regulatory oversight, can enhance accountability and confidence in an AFC regime.

In summary, an industry-operated AFC framework—overseen by government through clear rules, accreditation, enforcement, and mandatory interference response processes—offers the most effective and proportionate approach to realizing the benefits of AFC while safeguarding incumbent services and maintaining public confidence in the regime.

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?

Answer: Databases and coordination mechanisms administered or overseen by the ACMA should play a central role in any AFC framework, particularly in providing authoritative information on incumbent services and ensuring regulatory confidence in coordination outcomes. In this context, the RRL represents a valuable national resource that should be leveraged as a core input to AFC systems rather than duplicated or bypassed.

The RRL already serves as the authoritative record of licensed radiocommunications services in Australia, including fixed links and other incumbent users relevant to the 6 GHz band. Enabling accredited AFC operators to securely access appropriate RRL data—subject to clearly defined governance, data quality, and update requirements—would help ensure that coordination decisions are based on accurate, current, and regulator-endorsed information. This approach would reinforce trust in AFC outcomes for both incumbents and new users.

At the same time, AFC operation will likely require additional data handling and coordination functions beyond the RRL’s current scope, particularly to support near-real-time queries, geolocation-based calculations, and automated responses at scale. These functions are well suited to industry-operated AFC systems, operating under ACMA-defined rules, rather than requiring the RRL itself to be transformed into a real-time coordination platform. Clear interfaces and data exchange mechanisms between ACMA-maintained databases and accredited AFC operators would therefore be preferable to a single, monolithic system.

Other coordination mechanisms administered by the ACMA may also play a complementary role, particularly where they provide additional context on incumbent deployment characteristics or protection requirements. However, it will be important to ensure that data sources are clearly defined, authoritative, and consistently applied across all AFC operators to avoid divergent coordination outcomes.

In summary, the most effective approach would combine ACMA’s existing databases—particularly the RRL—as trusted sources of incumbent information, with industry-operated AFC systems responsible for dynamic coordination and decision-making. This model preserves regulatory authority and data integrity while enabling the scalability, flexibility, and innovation required for efficient AFC operation.

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?

Answer: A tiered access model for incorporating standard-power RLAN devices in the 6 GHz band should be approached with caution and, in our view, should not imply a hierarchy of spectrum access rights among license-exempt users. Standard-power devices coordinated under AFC system control (“AFC subscribers”) should not be afforded higher priority spectrum access than low-power

indoor (LPI) or very low power (VLP) devices operating under the LIPD class licence conditions. All such devices should retain equal regulatory status.

This approach is consistent with frameworks adopted in the United States and Canada, where standard-power, LPI, and VLP devices are all authorized as license-exempt users of the 6 GHz band. In those domains, AFC does not confer priority rights over other license-exempt devices; rather, it is a mechanism to protect incumbent licensed services while enabling higher-power operation where technically feasible.

From a practical standpoint, implementing priority access among license-exempt tiers would be complex to administer and difficult to enforce. The ACMA would face significant challenges in defining, monitoring, and adjudicating priority relationships between large populations of dynamically operating devices, particularly in dense deployment environments. Such an approach could also introduce uncertainty for manufacturers and service providers and undermine the simplicity that underpins successful license-exempt regimes.

Coexistence between standard-power and LPI/VLP devices can instead be managed through existing technical mechanisms. In particular, the ACMA already require the 6 GHz LPI and VLP devices to implement contention-based mechanisms such as LBT which provides an effective, decentralized means of facilitating fair spectrum coexistence among license-exempt users.¹ AFC complements these mechanisms by addressing a different problem set—namely, the protection of incumbent licensed operations—without altering the peer-to-peer coexistence model among license-exempt devices.

In summary, while AFC introduces an additional coordination layer to protect incumbents, it should not be used to create priority access rights among license-exempt users. Maintaining equal regulatory status for standard-power, LPI, and VLP devices offers a practical and internationally aligned approach to managing dynamic spectrum access in the 6 GHz band.

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?

Answer: Individual standard power devices should not be required to be registered on the RRL. Instead, authorization should be achieved through broader, system-wide licensing or class-license-based arrangements, with accountability placed on accredited AFC system operators rather than on individual end devices. Requiring registration of individual standard-power RLAN devices would be administratively burdensome, difficult to scale, and inconsistent with the license-exempt nature of 6 GHz RLAN operations. AFC-enabled deployments may involve large numbers of dynamically operating devices that change location, configuration, or operational parameters over time. Maintaining accurate, device-level registrations in the RRL would impose significant compliance costs on service providers and the regulator, without materially improving incumbent protection.

¹ ACMA's Radiocommunications (Low Interference Potential Devices) Class Licence 2025

International experience demonstrates that effective incumbent protection can be achieved without individual device registration. In the United States and Canada, AFC operates through system-level authorization models in which approved AFC operators are responsible for coordinating standard-power device operations in accordance with regulator-defined rules. Standard power devices are authorized to transmit based on successful AFC coordination, and compliance is enforced through oversight of AFC operators, device certification requirements, and post-deployment enforcement mechanisms.

For efficiency and regulatory consistency, Wi-Fi Alliance respectfully recommends that standard-power 6 GHz devices should be authorized under the existing Low Interference Potential Devices (LIPD) class licence framework, with operation explicitly conditional on successful coordination through an ACMA-approved AFC system(s). This approach preserves the license-exempt nature of 6 GHz RLAN use, maintains regulatory parity with LPI and VLP devices, avoids the need for bespoke licensing categories, and aligns Australia's framework with international practice, while ensuring robust protection of incumbent services.

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?

Answer: Accreditation, auditing, and compliance are essential to ensure that industry-led AFC operators manage standard-power device operations safely while protecting incumbents.

- *Accreditation:* ACMA should require operators to demonstrate technical capability, operational capacity, and governance structures, including maintaining accurate device and incumbent data, implementing power and channel rules, monitoring for interference, and ensuring cybersecurity. Accreditation should be conditional on meeting ACMA standards and subject to periodic renewal.
- *Auditing and compliance:* ACMA should require operators to maintain records of coordinated devices, operational parameters, and interference events. ACMA should have the authority to audit these records periodically to verify adherence to coordination rules.
- *Interference handling:* ACMA should mandate a process that would enable operators to investigate and resolve reports from incumbents efficiently. A centralized reporting framework, similar to the U.S. 6 GHz AFC Systems Interference Reporting Portal, could provide transparency and accountability (see response to Question 7 above).
- *Operational rules:* ACMA should codify technical and administrative obligations, including geolocation accuracy, power limits, record-keeping, and corrective actions, with enforceable consequences for non-compliance.

By concentrating accountability on AFC system operators, supported by enforceable rules and transparent interference-handling processes, Australia can enable scalable and AFC-controlled

standard-power deployments while ensuring robust protection of incumbent services in the 6 GHz band.

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?

Answer: Successful implementation of AFC requires a combination of technical and administrative features to ensure efficient coordination, protection of incumbents, and reliable spectrum use. Key elements include:

- *Real-time geolocation and device registration* – standard-power devices must be capable of providing location information to their controlling AFC system to support channel availability determinations and prevent harmful interference. To ensure scalability, device-level data should be maintained by accredited AFC operators rather than the RRL.
- *Database accuracy, integrity, and update mechanisms* – AFC systems must use authoritative incumbent data, such as the ACMA's RRL, and maintain high data quality with timely updates. System integrity and cybersecurity safeguards are essential to prevent errors or misuse.
- *Exclusion zones and channel assignment rules* – AFC system must enforce protection for incumbents through geographic and frequency-specific restrictions, supported by dynamic coordination algorithms.
- *Interference reporting and resolution processes* – authorized AFC operators should implement clear procedures to investigate and remediate interference, similar to the U.S. AFC Systems Interference Reporting Portal, providing transparency and accountability for incumbents.

By combining these features, AFC implementation can provide dynamic, efficient, and safe coordination of standard-power 6 GHz devices, enabling high-performance RLAN operation while preserving incumbent protection and regulatory confidence.

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?

Answer: The ACMA's RRL should be sufficient to support AFC operations, provided that incumbents maintain accurate and up-to-date records of their deployments. Reliable incumbent data is essential for AFC systems to make correct frequency assignments and prevent harmful interference.

Where AFC systems require near-real-time coordination, the RRL can serve as the authoritative source of incumbent information, while dynamic queries and device coordination are managed by authorized AFC operators. Ensuring that incumbents keep their deployment data current—combined with ACMA oversight—will allow existing systems to support safe, efficient AFC operation without the need for new databases.

For additional information, ACMA may also consider the [AFC guidance and specifications](#) available from Wi-Fi Alliance, which provide technical and operational best practices.

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

Answer: The expected market for the provision of AFC services in Australia will be strongly influenced by the amount of spectrum made available for standard-power 6 GHz RLAN operation. Sufficient contiguous spectrum is essential to support high-capacity use cases, including outdoor Wi-Fi, fixed wireless access, enterprise networks, and other applications that rely on wide channel bandwidths for performance and reliability.

If spectrum access is fragmented or limited, the commercial viability of AFC services will be reduced. Operators may be unable to offer high-throughput or large-scale deployments, which could reduce investment incentives, limit service offerings, and undermine the efficiency and innovation benefits that AFC is intended to enable.

Conversely, making the full 5.925–7.125 GHz band available for AFC-enabled standard-power operation, consistent with international harmonization, would maximize the addressable market and allow AFC operators to deploy services at scale. A larger and contiguous spectrum allocation facilitates economies of scale, promotes equipment commonality, and supports advanced applications that drive consumer, enterprise, and service-provider value.

In summary, the viability and uptake of AFC services in Australia will depend directly on the spectrum made available. Ensuring sufficient access will be critical to realising the technical and economic benefits of AFC, while constrained or fragmented allocations could limit market development.

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?

Answer: There is no need for the ACMA to adopt prescriptive regulations specifying technical or operational implementation details for AFC-enabled devices. Instead, the ACMA should establish a clear regulatory framework that sets the rules for incumbent protection, device authorization, operator accreditation, and compliance, while allowing industry the flexibility to implement solutions that meet these objectives. This principles-based approach enables AFC system operators and device manufacturers to innovate and adopt best practices consistent with international standards and emerging technologies, while ensuring that devices operate safely within the 6 GHz band.

By setting clear regulatory objectives while allowing the private sector flexibility to implement the technical solutions, ACMA can achieve effective AFC deployment, protect incumbents, and encourage innovation and efficient spectrum use without imposing unnecessary regulatory burdens.

Conclusion

A well-designed AFC framework in the 6 GHz band can enable efficient spectrum use, high-capacity RLAN deployments, and protection of incumbent services. By leveraging industry-led AFC operations

under ACMA oversight, relying on the RRL, and providing principles-based guidance rather than prescriptive rules, Australia can achieve a scalable, flexible, and internationally aligned 6 GHz standard-power device ecosystem. Wi-Fi Alliance remains committed to supporting ACMA's efforts to develop and implement an effective AFC framework and looks forward to continued collaboration to maximize the benefits of standard-power 6 GHz operation.

Respectfully submitted,

/s/ Alex Roytbat

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