Apple Draft Response to Australia “Five-year spectrum outlook 2026–31 and 2026–27 work program” Consultation

Consultation Deadline 3 May 2026

Apple Response

Apple welcomes ACMA’s continued leadership in enabling innovative and efficient use of the 6 GHz band. In particular, the availability of lower 6 GHz for RLAN, together with the additional 160 MHz in 6425–6585 MHz, provides an important foundation for supporting leading-edge Wi-Fi technologies such as Wi-Fi 6E and Wi-Fi 7, which are increasingly critical to delivering high-capacity indoor connectivity.

We also support ACMA’s ongoing work on AFC and database-assisted sharing frameworks, which can enable higher-power RLAN deployments while ensuring appropriate protection of incumbent services. These tools will be essential to maximise efficient spectrum use and support a broad range of use cases, including enterprise, industrial and outdoor connectivity.

As ACMA continues to consider the future use of the wider upper 6 GHz band, we would encourage a balanced, technology-neutral approach that maintains flexibility over time. There may be value in exploring mechanisms that allow opportunistic or AFC-controlled RLAN access in parts of the upper 6 GHz band designated for future licensed mobile use, especially in the period prior to large-scale deployment of such services. This would help ensure that spectrum can deliver immediate benefits to consumers and businesses, while preserving long-term policy options.

We also note ACMA’s ongoing work to help inform Australian positions on WRC-27 Agenda Item 1.7, including possible IMT identifications in parts of 7125–8400 MHz. Apple supports a forward-looking and evidence-based approach to these studies, provided that any possible future consideration of IMT in this range is pursued in a way that remains complementary to existing and near-term LIPD Class License use of 7-8 GHz spectrum, while also ensuring that other important incumbent and adjacent-band technologies are not adversely affected. It will be important that any possible future IMT identification or associated technical conditions do not create overlap with, or undue constraints on, UWB Channel 9 ecosystem use cases, which are increasingly important for secure proximity, device-to-device and spatial awareness applications. In this context, future work under WRC-27 AI 1.7 should support orderly long-term coexistence and balanced spectrum planning, rather than constrain near-term innovation and deployment across the broader wireless ecosystem. As such, provided incumbent services could be protected, Apple could support an IMT identification in the band 7125-7250 MHz, while Apple opposes to an IMT identification in frequency ranges that may impact UWB channel 9 operation (in-band or adjacent-band).

Apple has interests in the Ultra-Wide Band (UWB) technology in this portion of the spectrum, where the UWB channel 9 resides. This channel is the core channel for UWB as it offers the greatest worldwide regulatory acceptance. Also, keeping in mind that after the identification of the 6 GHz band for IMT by WRC-23 (AI1.2), the use of UWB channel 5 is no longer feasible and thus the upper 7 GHz frequency range (i.e. UWB channel 9) is now the remaining essential channel for UWB.

Apple has been enabling UWB technology since iPhone 11 and is now extended to other Apple devices such as AirTags and today various applications such as digital keys (i.e. automotive keyless solution to open cars with the iPhone). UWB technology is supported by over one billion devices worldwide.

Apple kindly invites ACMA to consider the UWB applications’ economic importance and benefits to the Australian citizens when taking any decision related to AI 1.7 (WRC-27).

Apple would welcome the opportunity to address any ACMA queries with this submission.