AUSTRALIAN AIRPORTS ASSOCIATION

3 May 2026

Manager, Spectrum Licensing Policy
Australian Communications and Media Authority
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By upload: spectrumworkprogram@acma.gov.au

Dear Manager

Submission on the draft *Five-year Spectrum Outlook 2026–31 and 2026–27 work program with a focus on aircraft radio altimeter band adjacency*

Thank you for the opportunity to comment on the draft *Five-year Spectrum Outlook (FYSO) 2026–31 and 2026–27 work program*.

We appreciate ACMA's continued engagement with stakeholders on these complex issues and recognise the importance of forward-looking spectrum planning to support Australia's communications needs.

This submission is intended to be read alongside our earlier joint submission on "Additional assurance measures for the coexistence of wireless broadband services and radio altimeters." In that earlier submission, we raised concerns regarding unresolved coexistence issues for aircraft radio altimeters operating in the 4200–4400 MHz band, including the potential for harmful interference from wireless broadband services in neighbouring frequency ranges.

We note that the draft FYSO refers to possible IMT identification in the 4400–4800 MHz range under WRC-27 agenda item 1.7, and discusses the broader 4400–4990 MHz band as an area of ongoing interest, including in connection with 5G standardisation and potential future wireless broadband and public safety uses. Taken together with the continuing international study work and Australia's own preparatory processes, this indicates that the band is under active consideration rather than being a purely theoretical long-term issue.

We also acknowledge that the draft FYSO does not propose any immediate allocation or replanning decision in relation to this band, and that ACMA has placed it at the monitoring stage. That said, because this spectrum sits immediately above the 4200–4400 MHz radio altimeter band, we respectfully suggest that aviation coexistence considerations warrant express recognition in ACMA's future treatment of the band and in any Australian position developed in relation to possible IMT identification.

Our intention in raising this issue is not to oppose further study of the upper 4 GHz range, nor to suggest that future telecommunications uses could not be accommodated. Rather, it is to encourage a cautious and transparent planning approach that reflects the continuing importance of radio altimeter performance to aviation safety, the degree of active international

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and domestic consideration being given to the band, and the fact that related technical and regulatory work is still evolving. To this extent, a general expectation that adjacent-band services can later be "protected" would not necessarily provide sufficient assurance for aviation safety without a clear evidence base, practical coexistence analysis and appropriately robust safeguards.

Our recommendations to ACMA for consideration as part of this process are as follows:

1. The final FYSO should ideally acknowledge aviation adjacency as a relevant consideration for future work in the 4400–4800 MHz and broader 4400–4990 MHz range.
Given the proximity of this spectrum to the radio altimeter band, it would be helpful for the final document to note that any future consideration of mobile or related uses in this range would need to take account of adjacent-band coexistence issues and the operational implications for aviation safety.

2. Any Australian position on possible IMT identification, and any progression beyond the current monitoring stage, would benefit from being informed by a published coexistence assessment and a clear public-interest case.
Should ACMA in future consider supporting IMT identification in this band, or moving the band to a more advanced planning stage, we suggest that such work be supported by a coexistence assessment that addresses adjacent-band impacts on radio altimeters, including aggregate RF exposure in operational aviation environments, and by a clear explanation of the public-interest basis for any such step.

3. Key aviation stakeholders would benefit from early engagement in relation to any future work on this band.
We would welcome early and ongoing engagement with CASA and affected aviation stakeholders, including airports, airlines, pilots and manufacturers, so that operational and safety considerations can be properly understood alongside broader spectrum-planning objectives, including through Australia's relevant domestic and international preparatory processes.

4. A precautionary framing in the final FYSO would be beneficial.
In our view, it would assist all stakeholders if the final FYSO made clear that any future consideration of upper 4 GHz mobile use would proceed in a measured way, supported by appropriate technical analysis, meaningful consultation with aviation safety stakeholders, and recognition that generic assurances of compatibility may not be sufficient in the absence of demonstrated coexistence outcomes.

We support ACMA's objective of planning for efficient and beneficial spectrum use over the longer term. The aviation sector would have an increased level of confidence if the final FYSO were to acknowledge the relevance of aviation coexistence issues, signal that these matters will be addressed in any future work, and ensure that aviation safety considerations are considered early in Australia's development of positions on this band.

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We appreciate ACMA's consideration of this submission and would welcome continued engagement on these issues.

For any further information about this submission, please contact [redacted], Senior Manager Regulatory Affairs, on [redacted] or at [redacted].

Yours sincerely,

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/Signed/

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