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Peter Rindt, RBOC/BUD
[redacted]

Stakeholder comments on "The draft FYSO 2026–31, including factors affecting the 5-year outlook and future demand for spectrum, as well as the priorities outlined in our annual work program"

April 30, 2026

Dear Manager,

We would like to thank you and your offices for the ongoing commitment to achieving regulatory alignment, as well as consistency and flexibility for manufacturers, an essential undertaking, which offers continued benefits to all parties.

Please find following our comments on the current public consultation referred to above.

The draft clause (page 45):

Low interference potential devices (LIPD)
The LIPD class license authorizes a wide range of applications including Wi-Fi, Bluetooth technologies and IoT services along with other uses, including certain spread spectrum and ultra-wideband transmitters.

Recent developments
The Radiocommunications (Low Interference Potential Devices) Class License 2025 came into effect on 1 October 2025.

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Activities planned for 2026–27

We will continue to monitor international and domestic developments that may prompt variations to the LIPD class license.

The LIPD class license is generally updated every 18-24 months. The timing of the next review of the LIPD class license will be outlined in the next FYSO.

Bosch Proposed amendment for next LIPD update:

Refine the current generic UWB listing into technology specific UWB applications with the correct ETSI standard/s. This is specifically concerning UWB in the frequency band 6 – 8.5GHz.

Detailed Proposal:

1) Clarify and allow the UWB usage on vehicles (based on ETSI EN 302 065-3-X family).
   - For UWB radio determination in 6-8.5 GHz band, compliance according to EN 302 065-3-3 (e.g. for child presence, driver status, passenger position, intrusion, trunk opener, …).
   - For UWB keyless entry systems in 6-8.5 GHz band, compliance according to EN 302 065-3-1.
   - For UWB based vehicle tracking in 6-8.5 GHz band compliance according to EN 302 065-3-2 (e.g. for payment, parking, VRU tracking, ...).

   NOTE: For vehicular tracking, fixed outdoor usage would be necessary, see ETSI EN 302 065-2-4, based on fixed UWB outdoor usage as specified in ECC/DEC/(06)04.

2) Clarify and allow a more flexible UWB usage for material investigation (see ECC/DEC/(07)01) if in contact or in close proximity to the material).
   - ETSI is still working in several EN, all the applications will be specified in the ETSI EN 302 065-4-X family
   - UWB for building material inspection, see ETSI EN 302 065-4-1
   - UWB for fluid and gas analysis, see ETSI EN 302 065-4-2
   - UWB for ground mapping (vehicle application to map the ground underneath), see ETSI EN 302 065-4-4

   NOTE: More EN are currently under investigation, (e.g. medical, humidity, ...).

We appreciate the consideration given to our proposal.

Yours sincerely
Robert Bosch (Australia) Pty Ltd
Peter Rindt

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