Dynamic Spectrum Alliance Limited
http://www.dynamicspectrumalliance.org

May 3, 2026

Manager, Spectrum Licensing Policy
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

Re: Five-year spectrum outlook 2025–30: 6-month progress report

Dear Manager, Spectrum Licensing Policy,

The Dynamic Spectrum Alliance (DSA)[1] welcomes the opportunity to provide comments on the ACMA's Five-Year Spectrum Outlook 2025–30: six-month progress report.[2] This consultation is an important step in shaping Australia's spectrum management priorities, as it outlines progress on the 2025–26 work program and signals upcoming decisions on band planning, licensing frameworks, and international engagement. The DSA focuses on ensuring that the framework for the upper 6 GHz band remains flexible, forward-looking, and aligned with international best practice to maximise long-term economic and societal benefits in Australia.

The DSA supports the introduction of an AFC framework in Australia to enable standard-power RLAN operation in the 6 GHz band. We recognize that this framework is developed as part of a broader and coherent 6 GHz strategy. The DSA suggests that the AFC proceeding could consider extending beyond the 5925–6585 MHz, taking into account database-assisted coordination, dynamic sharing, and opportunistic access models to maximise efficient use of the upper 6 GHz band (6585–7100 MHz), particularly outside defined wide area wireless broadband (WA WBB) deployment areas.

From the DSA perspective, AFC is valuable not only because it enables higher-power outdoor RLAN use while protecting incumbent services, but also because it establishes the regulatory and operational foundations for more dynamic and efficient spectrum access over time. This is particularly relevant in Australia, where the ACMA has indicated that 6585–7100 MHz is likely to be used for future WA WBB, while also recognising the potential for AFC-enabled standard-power deployments outside defined WA WBB areas.

[1] The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA's website at: https://www.dynamicspectrumalliance.org/members.

[2] https://www.acma.gov.au/consultations/2026-03/draft-five-year-spectrum-outlook-2026-31

Accordingly, the DSA encourages ACMA to adopt AFC for standard-power RLAN operation for the entire 6 GHz band while maintaining flexibility for the future evolution of database-assisted sharing approaches. It may be prudent to avoid prematurely locking the upper 6 GHz band into a service-exclusive framework before actual deployment plans are better understood. The DSA recognizes ACMA's role in balancing different spectrum objectives and offers these views to support its ongoing assessment.

ACMA's position acknowledging the importance of the upper 6 GHz band for WAS/RLANs should be preserved and strengthened. It reflects an important recognition that the upper 6 GHz band need not be treated as a uniformly exclusive allocation, and that more flexible arrangements may be appropriate where WA WBB deployment is absent, delayed, geographically limited, or otherwise compatible with coordinated sharing mechanisms. This forward-looking approach would help preserve the potential for these coordination models to be extended to the upper 6 GHz band, should policy and technical conditions allow for it in the future.

In this context, ACMA may also wish to consider international developments. For example, approaches being explored by Ofcom[3] demonstrate how database-assisted coordination can support more adaptive and flexible spectrum-sharing models. The relevance of such examples is not to replicate another jurisdiction's framework directly, but to illustrate how modern coordination tools can enable more efficient use of spectrum compared to static allocation models.

For Australia, this suggests a practical pathway for the upper 6 GHz band. Where WA WBB deployment is planned but not yet realised, or is geographically limited, ACMA could consider permitting opportunistic RLAN access on a coordinated basis using AFC. This would improve spectrum utilisation, reduce the risk of prolonged underuse, and align access conditions with actual interference risk and deployment realities rather than purely worst-case assumptions.

This approach is also consistent with ACMA's broader recognition of the relevance of dynamic spectrum access beyond the immediate AFC proceeding. Supporting such flexibility would enable the framework to evolve alongside technological developments and market demand.

An economic study specifically made for Australia[4] shows that allocating the full 6 GHz band for RLAN use indicates greater cumulative economic value compared to a split-band scenario, even after accounting for IMT auction proceeds. It also finds that restricting RLAN access leads to significant performance losses across hotspots, residential speeds, WISP capacity, IoT sensor connectivity, and AR/VR applications, underscoring the need for ACMA to preserve flexibility for coordinated RLAN use alongside WA WBB.

The upper 6 GHz spectrum in the 6585–7100 MHz range therefore represents a strategic opportunity to enable modern, efficient, and scalable spectrum use in Australia. It can support a wide range of high-capacity connectivity applications across consumer, enterprise, and public sector environments, contributing to broader digital transformation and economic growth objectives.

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[3] https://www.ofcom.org.uk/spectrum/innovative-use-of-spectrum/consultation-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services

[4] https://www.dynamicspectrumalliance.org/2024/AssessingEconomicValueWi-FiAustralia2034-2044.pdf

To maximise the long-term value of the band, it is essential that the regulatory framework maintains the flexibility to support dynamic, data-driven sharing mechanisms while avoiding overly rigid allocation models that may inadvertently constrain innovation or broader access. By ensuring consistency across the wider 6 GHz regulatory environment and fostering a balanced ecosystem that harmonises robust incumbent protection with the deployment of new, high-capacity services, the framework will be better positioned to deliver sustained economic and societal benefits for Australia.

Sincerely,

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Dr. Martha Suárez
President, Dynamic Spectrum Alliance
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