



**Australian Government**  
**Department of Defence**

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ACMA IFC 32-2018

The Manager  
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Dear Nevio

### **IFC 32/2018-OPTIONS FOR WIRELESS BROADBAND IN THE 26 GHZ BAND**

1. Defence appreciates the opportunity to provide this submission in response to the public consultation on this topic (IFC 32-2018).
2. Defence is of the view that the chosen replanning option should preserve the ability to access apparatus licensing in areas where wireless broadband coverage is not present. Defence strongly supports the conclusion that 'Highest Value Use' need not represent a single service (or more specifically a single application of a service), but can be achieved by accommodating both incumbent and proposed services in the band.
3. The current Australian spectrum management framework does not encourage spectrum sharing between use types. This issue serves to highlight the potential benefits of the proposed single licensing framework foreshadowed under a new Radiocommunications Act.
4. The inherent barriers to sharing under spectrum licensing may lead to the conclusion that type 2 and type 3 users can only be efficiently accommodated by separating them from the type 1 users in frequency, as has been the historical practice. The use of spectrum licensing is also likely to be a barrier to sharing with other services and applications of the mobile service for which apparatus licensing is the most logical choice. For example, aeronautical mobile systems operating in this spectrum on a shared basis with civilian applications may be of future interest to Defence. Furthermore, as is highlighted by the potential for an underlay class licence, the characteristics of the 26 GHz band mean that co-frequency sharing is likely to be achievable even within areas where type 1 wireless broadband is deployed.
5. For these reasons, Defence is of the view that the use of spectrum licensing, although attractive to some stakeholders from an allocation perspective, should be restricted to spectrum-spaces where ubiquitous mobile broadband coverage is likely to be achieved, and where sharing with other services and applications of the mobile service is unviable. Apparatus licensing should be maintained as an option available to potential licensees to the maximum extent possible. This should include a close examination of the geographic areas to be made available for spectrum licensing which, in particular, need not include oceanic areas.

6. My point of contact for this issue is Dr Tharaka Dissanayake on (02) 6144 5035 or via email [tharaka.dissanayake@defence.gov.au](mailto:tharaka.dissanayake@defence.gov.au).

Yours sincerely,

A handwritten signature in blue ink that reads "David Murray". The signature is written in a cursive style and is underlined with a single horizontal stroke.

**David Murray**  
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