

AMTA submission on ACMA's Spectrum planning framework—Draft frequency coordination requirements review work program 2021-22

AMTA thanks the ACMA for putting the work program together and circulating it for comment. We support the ACMA's views on whether or not revision is required, for the various RALIs listed in Table 1, and just have a few suggestions below.

RALI LM8

We note that the ACMA proposes to review RALI LM8 by mid-2023. The 30 June 2023 date seems to align with the beginning of Milestone 5, which is the “home stretch” for clearance of the band. However, it is noted that the compliance date is 30 June 2024. As such, we believe that the items in the dot points could be broken up into separate stages:

1. We believe it would be prudent to make the changes to Annex E earlier rather than later so that users of trunked land mobile services (TLMS) will be aware of the spectrum environment in which they'll be operating. It will also serve to provide an added degree of certainty to the winning bidders of the late-2021 850/900 MHz auction. As such, we believe these modifications can be made considerably earlier than 30 June 2023, **e.g. mid-2022**.
2. What's also needed prior to the 2024 compliance date (see below) is clear guidance that the pre-transition or 'legacy' arrangements are only temporary and that any TLMS in the pre-transition arrangements are subject to a requirement to shift down to the post-transition arrangements by no later than the compliance date. It should also refer to RALI MS 40 “800 MHz Plan” which has restrictions on new assignments in the legacy arrangements. This guidance should also be included in the earlier review (i.e. by mid-2022).
3. The editorial modifications to the tables mentioned (A1, B4.1, B4.2, B4.1a, B4.2a) comprise a very simple task that can be carried out quickly around the compliance date in **mid-2024**. It may be useful to keep the frequencies and channel plans for the legacy arrangements around—for information only—until there are no more services using those arrangements.

We also have no issue with the review of frequency-distance (F-D) constraints being undertaken prior to or in parallel to the work related to the 850/900 MHz Band.

RALI MS37

We note that the 2.3 GHz TLG recently came to a close and the outcomes of the TLG will be reflected in a review of the 2.3 GHz spectrum licence technical framework (SLTF). We also note that RALI MS 37 has not been updated since the last review of the band in 2013. Noting that RALIs MS 33 and 34 are being reviewed to take active antenna systems (AAS) into account, RALI MS 37 should also be reviewed to consider the impacts of base stations employing AAS with dynamic beamforming.

Contact

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