

The Manager  
Major Spectrum Allocations Section  
Spectrum Allocations Branch  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

Dear Sir/Madam,

### **Draft spectrum re-allocation recommendation for the 850/900 MHz band**

Thank you for the opportunity to provide comments on the Consultation paper, "*Draft spectrum re-allocation recommendation for the 850/900 MHz band*", released in May 2020. Our comments specifically address the proposed terms of the draft recommendation, as set out in the notice under section 153G of the *Radio communications Act 1992* (the Act) (refer to the email dated 14 May from Peter Wardle (Executive Manager, Spectrum Allocations Branch, ACMA) to potentially-affected apparatus licensees).

Airservices Australia (Airservices) is a government-owned organisation providing safe, secure, efficient and environmentally responsible services to the aviation industry. We safely manage 11 per cent of the world's airspace with more than four million aircraft movements carrying more than 160 million passengers annually. Airservices provides the aviation industry with telecommunications, aeronautical data, navigation services and aviation rescue firefighting services.

Airservices currently utilises low capacity point-to-point fixed link services operating in the 800/900 MHz band in support of critical air-ground voice, surveillance and air traffic management. These services are complemented by low speed point-to-multipoint systems providing operational status monitoring of aviation navigational aids. Airservices is actively decommissioning a number of these fixed link services in the second half of 2020, on completion 14 point-to-point and 4 point-to-multipoint fixed links will remain in service.

The 14 point-to-point fixed links comprise of paired assignments for two-frequency (low-capacity) fixed services operating in the bands 854-857 MHz paired with 930-933 MHz. The 4 point-to-multipoint fixed services operate in the bands 853.5-854 MHz paired with 929.5-930 MHz, which are not part of the draft re-allocation recommendation but are still required to cease operation by 30 June 2021 (Milestone 3 of the 803-960 MHz milestone transition timeline). For further background on our fixed services deployed in the 800/900 MHz band please refer to Attachment A.

In February 2006, Airservices provided the ACMA with details on our critical fixed service infrastructure deployed in the 800/900 MHz band when responding to the Discussion paper, "*Spectrum strategies to support Wireless Access Services (WAS)*". This advice explained Airservices' financial commitment on infrastructure that utilises this band was and still is very high. At this time we were in the process of purchasing communications equipment in the

854–857 MHz (paired with 930–933 MHz) band to support future expansions and to replace some of the older, less spectrally efficient systems. We then further expressed our concerns in June 2011 when responding to the initial Consultation, “*The 900 MHz band: Exploring new opportunities*”, including providing estimate financial costs for migrating the fixed services.

Airservices also responded in February 2013 to the Discussion paper, “*The 803 to 960 MHz band: Exploring options for future change*”. Our response advised our preference to retain the existing frequency assignments, but were open to migration arrangements within the 800/900 MHz band. However, we highlighted the cost and timelines to relocate fixed services in the 800/900 MHz, 1.5 GHz and 1.8 GHz bands need to be considered together in a reasonable manner.

The ACMA released the Decision paper, “*The ACMA’s long-term strategy for the 803-960 MHz band*” in November 2015, providing a detailed implementation plan on replanning the 800/900 MHz band. The Decision paper specified milestone transition timelines, including a Milestone 3 deadline of 30 June 2021 for two-frequency fixed links (including point-to-point and point-to-multipoint links).

Airservices determined it was not feasible to retune our existing fixed services (LEDR links) into the new segments for fixed services in the 800/900 MHz band. In 2018 an Enterprise Network Modernisation Program (ENMP) was initiated to identify options and pursue modernising Airservices network and telecommunication services, inclusive of addressing the remaining fixed link services operating in the 800/900 MHz band.

Earlier this year Airservices met with the ACMA where we advised we anticipated difficulties in achieving Milestone 3 of the 803–960 MHz milestone transition timeline, primarily due to complexities in the telecommunication replacement, this has been further impacted by the down turn in the aviation industry through the 2020 bushfires and COVID-19.

In recent years Airservices has committed over \$7M in migrating fixed link services within impacted bands and over \$14M in sustaining fixed link services, throughout this time Airservices has continued to remain committed to invest in order to meet ACMA requirements. It is anticipated an additional \$11M in funding will be required to address remaining fixed link services operating within impacted bands.

Airservices appreciates the ACMA need to provide for the projected increase in demand for 4G/5G mobile broadband services in the 800 MHz band, and is conscious the 850 MHz expansion band draft recommendation includes the 854-870 MHz segment impacting the fixed point-to-point (two-frequency) service allocation.

Airservices also understands two-frequency point-to-point and point-to-multipoint fixed services need to transition out of the 800/900 MHz band by 30 June 2021. Airservices is not currently in a position to meet the Milestone 3 deadline as transition to a modernised network solution is scheduled to commence in Q1 FY22 (July 2021).

The section 153G notice invites written comments from potentially affected apparatus licensees on the ACMA proposal to recommend the Minister make one or more re-allocation declarations for the 850/900 MHz band. As indicated above, Airservices expects many of its fixed services will need to continue to operate in the 800/900 MHz band during the re-allocation period ending 30 June 2024.

Airservices would like to work with the ACMA and provide ongoing briefings in working towards having as many fixed services as possible transition out of the band.

In summary, Airservices anticipates not meeting the Milestone 3 transition deadline (30 June 2021) and is developing a work program to transition fixed services out of the 800/900 MHz band before the end of the re-allocation period (30 June 2024).

Airservices seeks exemptions for its two-frequency (low-capacity) point-to-point and point-to-multipoint fixed services operating in the bands 854-857 MHz paired with 930-933 MHz and the bands 853.5-854 MHz paired with 929.5-930 MHz, respectively.

Please do not hesitate to contact Eddy D'Amico – Airservices Frequency Spectrum Manager ([eddy.damico@airservicesaustralia.com](mailto:eddy.damico@airservicesaustralia.com)) should you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Mark Hind', with a stylized, flowing script.

Mark Hind  
A/Chief Information Officer  
Airservices Australia

07 July 2020