

Wireless Internet Service Provider Association
of Australia Inc

**Response to ACMA - area-wide apparatus licence
discussion paper**



The Manager - Major Spectrum Allocations Section
Spectrum Allocations Branch
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Thank you for the opportunity to provide a response to the area-wide apparatus licence paper, the Association represents a wide variety of carriers in Metropolitan and Regional areas, typically smaller operators who have limited or no access to spectrum.

- 1) *Do you think the proposed characteristics of the AWL type will support your current or intended network deployments? Are there any other kinds of deployments that you believe the AWL type should support?*

WISPAU : We believe the current proposal is a step in the right direction and we certainly welcome increased flexibility with the current licencing framework.

There are a few additional deployment scenarios that the AWL should be modified to support, these include technologies that increase efficiency with point to point and point to multipoint transmissions, such as; beam forming, multi-in multi-out (MIMO) technology, cross polarity and space diversity deployment methods.

These should be classified as a transmission cluster with one applicable fee as opposed to each distinct transmitter being licensed individually, this would encourage much greater efficiency with respect to spectrum use in any particular band.

- 2) *Which bands and/or geographic areas do you believe would be conducive to the use of an AWL?*

WISPAU : AWL should be extended to all bands in all areas across Australia, as we have increasingly seen from the ACMA's own discussion papers on 26 & 28 GHz and the introduction of "defined areas" the concept of High, Medium, Low and Remote density is not flexible enough, it is our belief that spectrum costs should be reduced across the board to allow wireless technologies to compete with fixed line services, especially in metropolitan areas, a good start would be abolishing the extremely high apparatus tax rates in what is deemed "High density" despite some areas classified as such having extremely low population density.

- 3) *What technical and other matters do you believe the ACMA should consider in deciding to use AWL licensing in a particular band?*

WISPAU : Yes, as mentioned above, the current apparatus license framework does not properly accommodate new and highly efficient technologies like beamforming, MIMO, space diversity or cross polarisation, the framework needs to be modified to provide a price incentive for users of the spectrum to be more efficient, this is not the case at the moment.

- 4) *Do you have any other comments on the AWL concept?*

WISPAU : The AWL concept should be extended as a matter of priority to bands that support point to multipoint bands in regional areas, for example should incumbent 3.6 GHz users be allowed to convert existing apparatus licenses into area-wide apparatus licenses it's conceivable that the requirement for spectrum would be dramatically reduced through more efficient use and existing holdings could be relinquished early.

Regards,

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