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The ACMA
Red Building, Benjamin Offices
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Response to ACMA consultation on proposed area wide apparatus licence

Sirion welcomes the opportunity to respond to ACMA's consultation on the proposed area wide apparatus licence.

Spectrum is a scarce resource and initiatives such as ACMA's proposed area wide apparatus licence are important to make the most efficient use of this valuable resource as well as providing the opportunity for innovative new applications and niche applications. Equally though, it is vital that the interests of existing licence holders are recognized and protected when AWL type licences are being granted to ensure both can coexist.

The right balance between these priorities will ensure that everyone obtains the maximum benefit from the radio spectrum.

As you know, Sirion is in the process of bringing into use an Australian satellite system filing, and we have a significant interest in the use of the various spectrum bands within our filing in Australia. We anticipate that, when operational, the Sirion satellite system will provide substantial benefits to all Australians, across a wide range of possible use cases. We look forward to working with ACMA both to bring into use our system, but also to identify opportunities to enhance the existing and proposed regulatory environment in which we will operate.

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?

No comments

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

No comments

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

When ACMA assess whether to use AWL we believe that the following technical aspects should be considered:

- Whether the application is fixed use or mobile use
- Identify the interference scenarios that may occur.
- Assess each interference scenario on the basis of:
 - the sensitivity of the incumbent users to the proposed interference regarding geographical location
 - the sensitivity of the incumbent users to the proposed interference regarding transmit power
 - the sensitivity of the incumbent and adjacent band users to out of band emissions.

Do you have any other comments on the AWL concept?

AWL licences should have a condition requiring that devices only operate within the specified geographic location

We consider that every licence holder has a responsibility to ensure they comply with their licence conditions. For the AWL licences, the geographic limitation is the factor that enables the licence to exist. Therefore, every AWL licence should have a condition that the licence holder must implement systems to ensure all transmitters remain within the geographic area specified in the licence.

This condition should be flexible and tailored to the application. For example, an AWL using devices that are in fixed locations would simply be a case of ensuring that the devices were only ever located within the approved area.

For mobile devices this restriction is more important as the chances that they are used outside of the geographic area specified in the licence increase significantly. In this case, the condition should be designed to require the licence holder to implement whatever measures are necessary so mobile devices only transmit when they are within the specified geographical location.

With the proliferation of location enabled devices and proven technology such as database systems for managing spectrum sharing on a location basis this should not be an onerous requirement for AWL licences.

A trial of AWL licences should be undertaken before full implementation begins

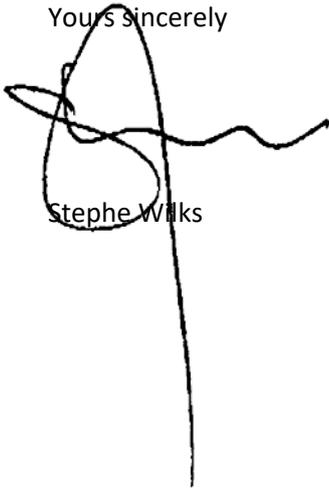
We believe that a trial period would be a sensible and proportionate step to take to test the AWL system before moving to full implementation. Limiting AWL to just a few initial bands for an 18 month period would:

- allow valuable lessons to be gained that could be incorporated into the full system at the end of the trial.
- Careful choice of the bands should allow mobile and fixed applications to be tested.

- A trial would allow incumbent users to assess and monitor potential interference into their networks which would be an important test of the technical co-ordination requirements of AWL licences.
- Demand for this type of licence product would be revealed and better understood.

We would be delighted to expand on any of these points if useful to you, or to follow up otherwise as required.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'Stephe Wilks', written over the typed name. The signature is stylized with a large loop and a long vertical stroke extending downwards.