



Australian Government
Department of Defence
Chief Information Officer Group

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ACMA IFC 19-2019

The Manager
Spectrum Management Outlook and Strategy Section
Spectrum Allocations Branch
Australian Communications and Media Authority
PO Box 13112, Law Courts, Melbourne, VIC 8010

PROPOSED AREA-WIDE APPARATUS LICENCE- DISCUSSION PAPER

References:

- A. The licensing system- Supporting material for the Exposure Draft of the Radiocommunications Bill 2017, May 2017
 - B. IFC 21/2015-Licensing 400MHz Harmonised Government Spectrum, Sep 2015
1. Defence appreciates the opportunity to provide a submission in response to the public consultation on this topic (IFC 19-2019). Defence in principle supports the proposed Area Wide Licence (AWL) type. It is encouraging to see that ACMA is going to issue these licences in the 26 GHz band, to support campus-type, small area deployments.
 2. Reference A provided template licences, one of which represents area wide licensing of radiocommunication services. Furthermore, in Reference B the ACMA proposed technical aspects of a new licence type very similar to the proposed. None of those has progressed to the stage of implementation. It is worth investigating whether there are any lessons to be learned from those attempts.
 3. Defence proposes that ACMA conducts one or more stakeholder engagement workshops to identify critical dependencies. For example:
 - a. should the authorised licence area be defined using the Hierarchical Cell Identification System (HCIS) or site and radius or something else?
 - b. how should the technical parameters for interference assessment be provided? (e.g. boundary conditions, device parameters, licensing instructions)
 - c. how is pricing going to be determined in the most effective and fair manner? (e.g. fee discounts to compensate for management efforts, fees for device registration)
 - d. what are the anticipated changes to SPECTRA system? (e.g. new data items, daily data extracts, licence lodgement system, device registration methodology)
 - e. what is the timeline of implementation of those changes? (e.g. period of user acceptance testing, make available sample data extracts)

4. The Register of Radiocommunication Licences (RRL) provides situational awareness for the accredited persons to conduct interference analysis. Defence believes that device registration, where possible, is important in achieving this.

5. My point of contact is Dr Tharaka Dissanayake on (02) 6144 5035 or via email tharaka.dissanayake@defence.gov.au

Yours sincerely

A handwritten signature in black ink that reads "David Murray". The signature is written in a cursive style with a long horizontal stroke extending from the end of the name.

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