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The Manager  
Wireless Broadband Section  
Australian Communications and Media Authority  
PO Box 78  
BELCONNEN ACT 2616

**Comments on IFC 31/2021**  
**Planning for wireless broadband use in urban areas in the 3400–3475 MHz band**

DB Telecommunications Pty Ltd is pleased to be able to offer some comments on the various issues raised in the ACMA's options paper.

**Question 1**

Comment is sought on the draft amendments to the s.145(4) Determination contained at Appendix B (separate attachment in key documents section of this consultation). Should additional measures be included to also grandfather device registrations when minor modifications are made? If so, what minor modifications should be permitted? For example, changes that results in the same or lower horizontal radiated power for the purposes of device boundary calculations? Alternatively, changes that result in the same or smaller device boundary as originally calculated when registering a device?

DB Telecommunications would support the proposed amendments to the s.145 Determination and summarized in Table 2 of the paper, particularly with respect to the proposed use of a 3 sec DEM, modifications to the way the device boundary is calculated and proposed propagation and clutter loss models.

DB Telecommunications supports the grandfathering of existing registrations providing they can have their horizontally radiated power modified to fit within the revised device boundary criteria.

**Question 2**

Comment is sought on the proposed changes to receiver spurious emission limits on 3.4 GHz spectrum licences detailed in Tables 4 and 5 for non-AAS and AAS receivers respectively.

DB Telecommunications believes that it makes sense to align receiver spurious emission limits with 3GPP standards.

### Question 3

Comment is sought on the draft amendments to RALI MS44 contained in Appendix C (found separately in key documents section of this consultation).

DB Telecommunications supports the proposed draft amendments to RALI MS44.

### Question 4

Comment is sought on the options developed for use of spectrum in urban excise areas.

DB Telecommunications would support Option 3 for the urban excise areas, as it would provide access to 3400 to 3475 MHz to a larger number of operators. This would lend itself to the deployment of LA WBB services under an AWL arrangement.

DB Telecommunications has highlighted in submissions to previous consultations, that there is a pent-up demand for LA WBB in this band, due to a previous lack of apparatus licensed spectrum in metropolitan areas.

Dedicating this segment to LA WBB also helps to minimise some of the potential interference to licensees in adjoining segments through interference mechanisms, such as ducting. It is envisaged that potential interference between LA WBB licensees could be managed adequately through the technical framework.

DB Telecommunications could support Option 4 if the ACMA agreed to not allow any macro cell developments in 3800 – 4000 MHz in metro areas, as this segment is currently proposed for LA WBB and FSS in metro areas.

Even under Option 4, some spectrum may still need to be provided in 3400 to 3475 MHz to cater for LA WBB services that cannot be accommodated in 3800 – 4000 MHz in some cities, due to the presence of FSS, as noted in the options paper.

### Question 5

Views are sought on the possible interference management approaches for both co-channel mechanisms (including ducting) and adjacent channel mechanisms (including adjacent band coexistence) contained at [Appendix E](#).

DB Telecommunications generally supports the range of interference mechanisms outlined in Appendix E.

With regard to Option 1, DB Telecommunications would generally favour Option A from a frequency assignment perspective.

#### Question 6

Comment is sought on the desirable planning outcomes for use of spectrum in urban excise areas.

DB Telecommunications believes that Option provides the best overall compromise in terms of satisfying the four planning objectives.

It provides good protection for incumbent NBN Co services and offers NBN Co the greatest flexibility in terms of expanding its existing services.

#### Question 7

Comment is sought on the ACMA's preliminary preferred option. Are other options preferred, and if so, why?

As stated in the answer to Question 4, DB Telecommunications believes that Option 3 is superior to the ACMA's preliminary preferred option, because it provides greater support for LA WBB services in urban excise areas.

DB Telecommunications has noted that there is a pent-up demand for LA WBB in this band, due to a previous lack of apparatus licensed spectrum in metropolitan areas.

DB Telecommunications could support Option 4 if the ACMA agreed to not allow any macro cell developments in 3800 – 4000 MHz in metro areas, as this segment is currently proposed for LA WBB and FSS in metro areas.

Some spectrum may still need to be provided in 3400 to 3475 MHz to cater for LA WBB services that cannot be accommodated in 3800 – 4000 MHz in some cities, due to the presence of FSS.

DB Telecommunications wishes to thank the ACMA for the opportunity to respond to this options paper and looks forward to being able to elaborate on the comments made in this submission, if required.

If you would like additional information or wish to discuss any aspect of my submission, please do not hesitate to contact me on (03) 9331 3170 or by email [dbritt@dbtelecomm.com.au](mailto:dbritt@dbtelecomm.com.au).

Yours sincerely,



David Britt  
Director