

## **Swoop Holdings Limited**

ACN 009 256 535, Cirrus Communications Pty Limited ACN 109 931 731 (trading as Swoop, the Swoop Business)

## **3400-4000 MHz band Technical Liaison Group**

**Allocation of AWLs in the 3.4–4.0 GHz band in remote Australia - IFC 11/2022**

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## Responses to Questions

### Technical framework

Do you have any comments, and supporting additional information, on the proposed technical framework, including the revised AWL LCD, draft RALI MS 47, and updated RALI FX3 and FX19?

No

Do you have any comments on the other issues referred to in the technical framework that have not been resolved in the TLG, such as WBB coexistence with radio altimeters?

No

### Allocation process

Do you have any comments on our proposal to use a multi-stage administrative allocation for apparatus licences in the 3.4–4.0 GHz band in remote Australia? Please provide any additional information in support of your views.

No

Do you have any views on the appropriateness of an allocation quantum policy? If an allocation quantum policy is adopted, do you have any views on whether that quantum should be 100 MHz or 150 MHz or some other quantum per single HCIS level 0 cell?

We support the allocation quantum policy approach. We believe that quantum should be 100 MHz, or lower, to support both more users and flexibility around spectrum needs for different intended use cases.

### Tenure and renewal

Do you have any comments on our licence tenure and renewal policy for AWLs in the 3.4–4.0 GHz band in remote areas?

We support maximum license tenures no shorter than 5 years, and flexibility afforded by shorter tenures.

### Pricing

We are proposing \$/MHz/pop tax arrangements for AWLs in this band, similar to AWLs in the 26/28 GHz band, and similar to other area-based licences such as PMTS B

apparatus licences, because we believe it to be a simple pricing arrangement well-suited to area-based licences no matter the size of the licence or where it is located. Do you have any other pricing alternatives, or suggestions that may improve upon our proposal?

We support an approach similar to the 26/28GHz AWL tax structure.