



MOTOROLA SOLUTIONS

May 2, 2022

The Manager
Spectrum Management Outlook and Strategy Section
Australian Communications and Media Authority
PO Box Q500

Queen Victoria Building NSW 1230

Consultation number 11/2022: Allocation of AWLs in the 3.4–4.0 GHz band in remote Australia

Motorola Solutions is pleased to comment on the ACMA's consultation paper mentioned above.

Please let me know if you have any questions.

Yours sincerely,

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There is a rapidly growing demand for spectrum in the mid-bands, especially for deployment of broadband 5G technologies, ITS (Intelligent transportation systems), and WIFI6e. Motorola Solutions is one of many Industry members and technology users that considers the mid-band spectrum ideal for private broadband networks and believes private systems and dedicated spectrum will remain important for localized coverage and critical applications that require reliable, and resilient service. This arrangement is critical to address the needs of the Industry 4.0 and other vertical sectors that are opting to build, own, and operate their networks independent of established, wide-area networks offered by major commercial carriers.

Motorola Solutions supports using the 3400-4000MHz frequency range for the allocation of AWL's (area-wide apparatus license).

In addition, Motorola Solutions strongly supports standards-based technology and spectrum harmonization in major markets across Asia-Pacific, Europe, and the Americas. The wide use of standards-based technology and spectrum harmonization reduces costs for manufacturers and service providers, maximizes competition, and results in faster technology developments and adoption. Economies of scale generated from harmonization and standards-based technologies significantly reduce equipment costs.

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Technical framework

- 1. 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**

Motorola Solutions: No comment

- 2. 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?**

Motorola Solutions: Some private network deployments by industry verticals and enterprise users may be for indoor coverage (e.g., smart building). For such deployments, the maximum e.i.r.p. transmitter output is likely to be lower than 41dBm/MHz. For example, the maximum power spectral density (PSD) of the U.S. Federal Communications Commission's (FCC) Category A Citizens Broadband Radio Service Device (CBSD) is 20 dBm/MHz; Category A CBSDs are intended for indoor deployments.

Allocation process



3. 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.

Motorola Solutions: No comment

4. 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?

Motorola Solutions: As noted, there is a strong demand for spectrum and licensing arrangements that enable the deployment of private broadband networks globally. There are currently many examples of private/industry verticals exploring business models that use their equipment to run their own networks. That is the case with several companies in Oil and Gas, Mining, Industry 4.0, Utilities, and government entities such as public safety.

As indicated by ACMA in the consultation, a smaller quantum of spectrum will likely accommodate most use-cases and facilitate a greater number of licensees while preserving spectrum availability in the longer term compared to a larger quantum. As a result, it may facilitate uptake in the spectrum by users, such as ISPs (Internet service providers) and enterprises, whose demand for spectrum arises on an 'as needed basis.'

Motorola Solutions agrees that a smaller quantum will likely accommodate most use-cases and provide more significant deployment opportunities for more licensees. Motorola Solutions supports a quantum of 100 MHz.

Tenure and renewal

5. 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?

Motorola Solutions: No comment

Pricing

6. 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?

Motorola Solutions: No comment