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4 May, 2022

The Manager
Licence Allocation Section
Australian Communications and Media Authority
PO Box 78
BELCONNEN ACT 2616

Comments on IFC 11/2022
Apparatus licences in the 3.4–4.0 GHz band in remote Australia
Licensing, allocation process, technical framework and pricing arrangements – consultation paper

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

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?
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?

DB Telecommunications is happy to support the proposed technical framework, including the revised AWL LCD, draft RALI MS 47, and updated RALI FX3 and FX19.

DB Telecommunications has no specific comments on the issue of WBB coexistence with radio altimeters.

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.
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?

DB Telecommunications supports the proposed multi-stage administrative allocation for apparatus licences in the 3.4 – 4.0 GHz band in remote Australia.

Where there is competing demand for spectrum in a given area, the ACMA should prioritise the initial allocations to those organisations that have projects ready to go, as opposed to those organisations that merely wish to acquire spectrum for future use.

To try and avoid any potential for hoarding of spectrum, DB Telecommunications believes that organisations should be required to start implementing their systems within 2 years of being allocated spectrum.

When the administrative allocation for apparatus licences in the 3.4 – 4.0 GHz band is eventually extended to regional areas, DB Telecommunications believes that it will be important to give priority during the initial allocation period, to incumbent apparatus licensees that are required to relocate due to spectrum licensing, e.g., incumbent 3.6 GHz PMP licensees.

DB Telecommunications supports the implementation of a quantum allocation policy in the 3.4 – 4.0 GHz band and believes that 100 MHz would be an appropriate quantum per single HCIS level 0 cell. DB Telecommunications would also support the 20% quantum allocation being proposed by ARCIA, which falls roughly mid-way between the 100 MHz and 150 MHz limits proposed by the ACMA.

DB Telecommunications believes that there may be geographic areas where long term demand may well exceed supply and the ACMA may need to apply a smaller quantum, e.g., areas around Kalgoorlie where there is a high density of mining operations.

If any organisation needed spectrum in excess of the quantum, they could apply for an FAC Policy Exemption to put their case for extra spectrum.

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?

DB Telecommunications supports the proposal to limit the duration of the AWLs to 31 December 2030, in order to align with the expiry of spectrum licences in adjoining bands.

DB Telecommunications believes that many licensees will opt for yearly renewable licences, as they do for most other types of apparatus licences. However, the option to pay transmitter licence tax in annual instalments may provide greater incentive for licensees to take-out longer-term licences.

DB Telecommunications believes that the renewal of licences beyond the initial tenure period should be conditional on licensees demonstrating that they are actually using the spectrum, in order to discourage potential hoarding of spectrum.

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?

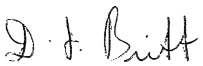
DB Telecommunications believes that the proposed licence tax arrangements for this band are appropriate and seem to be working well in the 26/28 GHz band.

DB Telecommunications is curious as to why the ACMA is proposing to have an issue charge of $202 per hour for AWLs in this band, whereas a flat fee of $152 appears to apply to AWL applications in the 26/28 GHz band.

DB Telecommunications wishes to thank the ACMA for the opportunity to respond to this consultation 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.

Yours sincerely,



David Britt
Director