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Pivotel response to ACMA's 'Exploring future use of the 1.9 GHz band – consultation'

11 February 2022

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Pivotel welcomes the opportunity to comment on the ACMA's consultation paper 'Exploring future use of the 1.9 GHz band – consultation' paper.

CONTEXTUAL STATEMENT

- Pivotel is pleased to see the ACMA's is considering allowing use of Wireless Broad Band (WBB) across the full 40 MHz band in one of the proposed scenarios.
- Spectrum in these bands is crucially important for the delivery of 4G and 5G mobile coverage, typically in relation to wireless broadband (WBB) usage.
- Providers such as Pivotel are well placed to play a unique and relevant role in improving coverage and bringing innovation to parts of regional and remote Australia. This is however predicated on access to suitable spectrum at a cost that enables a reasonable return on investment.
- Pivotel's view is that a dynamic and flexible approach is appropriate recognising the different needs and characteristics of Australia's unique and geographically dispersed population providing more targeted and innovative approaches, which are required to service these low population density areas and more unique locations.
- As a mobile operator focussed on regional and remote Australia, we observe that rural community communication needs are constantly evolving, and Pivotel is keen to see appropriate spectrum allocation methodologies that enable these markets to be served in new and innovative ways, now and into the future.

In the 1880 MHz to 1920 MHz space, **Pivotel recommends ACMA's Scenario-5** proposal which includes allowing deployment of macro base stations to utilise the entire band whilst ensuring protection to the adjacent channel operators.

Pivotel is aligned with AMTA's submission on this consultation. Other specific views are shared as per responses to the specific questions raised by the ACMA.

Responses to Questions

1. What is the relevance of the Personal Handy-phone System (PHS) and should this use be retained?

Pivotel believes that PHS will continue to remain in demand in the foreseeable future, especially, with DECT's evolution to DECT NR-2020, which includes wireless IoT for massive machine communication having low latency.

2. **What is the interest in the use of new technologies to provide a service?**

i. How much spectrum is required to provide the service?

Typically, for WBB services, TDD 20 MHz is considered as a minimum to serve small enterprises and TDD 40 MHz is recommended as a minimum for medium to large enterprises including low density FWA.

ii. What interservice considerations need to be undertaken for the service to be deployed?

Pivotel has no comment.

iii. What are the deployment scenarios for the service?

In conjunction with DECT, the 1.9 GHz spectrum could be deployed for 4G/5G WBB and IoT mixed applications. New technologies such as Multefire will work harmoniously with DECT.

However, it should be noted that in regional areas, the spectrum coordination can become difficult due to adjacent active Band1 operators. In regional Australia, FDD Band3 is unavailable for apparatus licensing, and FDD Band1 (limited to 2x 10 MHz per apparatus licensee) can become fully utilised at some locations. These constraints can cause zero or less allocation than needed spectrum resulting into a missed opportunity to provide essential services to an enterprise for their operations.

2. Are services still using DECT or are they transitioning to DECT-2020 NR?

Pivotel believes that there will continue to be a significant consumption of DECT-2020 NR enabled by global economies of scale.

4. **Are there any applicable coexistence scenarios not identified? Are there any scenarios that are unlikely to be practically achievable (and hence the associated planning scenario should be discounted), or are there any that are readily achieved?**

The ACMA's scenarios seem to have well covered the use cases.

5. **What are possible planning scenarios and industry views on the overall future use of the 1.9 GHz band and its services:**

i. **How much spectrum is required (distinguishing between the minimum viable and desirable) to provide the service?**

- Minimum viable spectrum is 20 MHz for small enterprise requirements
- Minimum viable spectrum is 40 MHz for medium enterprise requirement and low density FWA application.

ii. **Is there a clear geographical delineation – for example, metropolitan or regional – for the service?**

Metropolitan, regional and remote boundaries could be created to manage allocation and the coordination rules specific for the zones.

6. Is there or will there be equipment?

Yes, there is already available radio base station equipment (licensed spectrum) providing capability at 1.9 GHz band. Multefire (unlicensed spectrum) technology will also support the band.

For any questions in relation to this response please contact:

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