



16 December 2022

Australian Communications and Media Authority
Via ACMA Website Submission

ABC submission to the ACMA regarding:

Review of 2 GHz spectrum licensing technical framework - consultation 38_2022

We welcome the opportunity to respond to the above consultation which was released by the Australian Communications and Media Authority (ACMA) in November 2022.

The ABC continues to rely heavily on the use of Television Outside Broadcast (TOB) facilities and the requisite spectrum for the capture and creation of content, particularly for live news gathering purposes. Increasingly, these services are being called upon in times of natural disaster and emergency situations. We are therefore concerned to preserve the utility of these services despite the ongoing proliferation and technical evolution of adjacent Spectrum Licensed services.

In light of this, the ABC also relies on the ACMA to work with the TOB operators to ensure any proposed changes which might affect TOB operations are made consultatively, and the ABC is therefore pleased to have had the opportunity to participate in the relevant Technical Liaison Group and discussion generally.

The changes proposed in this consultation focus on spectrum immediately upper adjacent to the ABC's TOB allocation. The impact of the proposed changes might therefore be more readily felt by the ABC compared with the other broadcasters whose allocations lie below the ABC. However, the framework allows sharing of TOB allocations amongst broadcasters and so the potential risk of increased interference is also shared.

The ABC, along with Seven Network, Nine Entertainment and Network TEN are licenced for TOB operations Australia wide in the 2010 – 2110 and 2200 – 2300 MHz bands. An important aspect of the 2010 – 2110 MHz band is its availability for use by helicopters as aerial outside broadcast platforms and it is this band that is the focus of the consultation. Helicopters can potentially operate anywhere, including at great distances from TOB collection point receivers. It is important to the broadcasters therefore that interference from other services does not impair the capability of these sensitive ground-based receivers to work reliably with the helicopter.

In terms of the proposed changes to unwanted emission limits in the 2100 – 2110 MHz region and the options presented in the Consultation Paper, the ABC would prefer Option 1, where existing EIRP limits are expressed as TRP.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'G. Bowman', with a long horizontal flourish extending to the right.

Gavin Bowman
ABC Transmission Contracts and Licensing