



March 15, 2023

**Shure's comments to ACMA's consultation on
Replanning of the 1880 - 1920 MHz band**

Dear ACMA Executives and Staff,

Shure Incorporated applauds the work of ACMA and welcomes the opportunity to provide its response to the above-mentioned ACMA's public consultation.

For more than 97 years, Shure (www.shure.com) has been a leading manufacturer of high-quality, innovative audio products. Shure is best known for its high-quality microphones, which are used by musicians, recording studios, broadcasters, and other professionals around the world. DECT technology is also used in solutions designed by Shure for use in conference rooms, boardrooms, and other meeting spaces.¹ They offer high-quality audio solutions that help to ensure everyone in the meeting can hear and be heard clearly, improving the overall effectiveness of the meeting.

Shure is a leading advocate for the audio industry in the spectrum arena, actively participating in spectrum consultations and engaged with various regulatory bodies at the national, regional and international (ITU) levels.

This response is an addition of our previous response provide in February 2022.

Shure respectfully provides answers to ACMA's specific questions hereafter:

1. The ACMA invites comments on the proposed desirable planning outcomes.

Shure has still some concerns about compatibility with technologies or systems, which are not compatible with DECT.

However, in general we support the outcomes of the planning.

¹ https://service.shure.com/Service/s/article/microflex-wireless-what-is-dect?language=en_US

- 2. The ACMA seeks stakeholders' views on any other applications we have not identified that could be accommodated under SR WBB.**

No answer.

- 3. The ACMA invites comments on the replanning options, especially the preliminary preferred option presented in this paper, and any alternative options.**

Shure supports ACMA's preliminary view that Option 4 is the preferred option for replanning the 1.9 GHz band as it offers the most flexibility. We support the expansion of the available frequency band to 1920 MHz for DECT usage.

We agree that sharing is a necessity for efficient future spectrum use. However, it is crucial that any new technology in the overall 1880 - 1920 MHz band does not generate interference and disturbance to existing and future DECT users.

The new DECT-2020 NR has been designed to be 100% spectrum-compatible with legacy/classic DECT, and hence this opportunity comes with no co-existence downside – in sharp contrast to the prospect of new technologies that are not compatible with DECT, including 3GPP-based NR technologies, MulteFire, etc that would likely cause interference, degrading Quality of Service.

- 4. Is personal handy phone system (PHS) technology still required to be included in the cordless communication devices class licence?**

We agree with ACMA's suggestion to remove PHS technologies from the CCD class licence while continuing to support DECT technologies in 1880–1900 MHz, based on industry submissions.

- 5. The 1900–1920 MHz frequency band plan will sunset on 1 April 2023. Is the band plan still required, or can the band plan be allowed to sunset?**

Shure believes that the band plan can be allowed to sunset.

- 6. The ACMA invites comments on coexistence considerations, and analysis on coexistence issues for the proposed options in this band.**

Shure notes that the link to MulteFire in 1.9 GHz white paper in ACMA's consultation was not working when we clicked on it. Therefore, we could

not assess the claim from the white paper that "co-existence between 1.9 GHz MulteFire systems and DECT systems can be achieved."

We recommend that ACMA conducts some additional analysis or measurements to confirm that MulteFire systems can indeed coexist with DECT systems which have been using the band.

Please contact the undersigned if you have any questions.

Respectfully submitted,
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