



Australian Radio Communications Industry Association
Unit 9/21 Huntingdale Road, Burwood, Vic 3125
Phone 03 8346 9640– email info@arcia.org.au

Ian Miller – Spectrum & Technical

20th April 2023

The Manager
Wireless Broadband,
Australian Communications & Media Authority,
PO Box 78,
Belconnen ACT 2618

Reference – Review of submissions - planning of the 1880 – 1920 MHz band.

The Australian Radio Communications Industry Association (ARCIA) is pleased to have the opportunity to contribute to the discussion process involving the replanning of this spectrum band, after reviewing the various submissions we are still of the opinion that the views expressed in our recent submission are valid and represent the best possible utilisation of this portion of the spectrum.

Reiterating, our preferred solution is for Option 4: SR WBB in 1880–1920 MHz and RMR in 1900–1910 MHz

The main elements of Option 4 are:

- Maintaining and expanding SR WBB uses under class licensing arrangements across the entire 1880–1920 MHz frequency range.
- Maintaining LA WBB and PTP access arrangements across the 1900–1920 MHz segment in regional and remote areas.
- Introducing RMR services in the 1900–1910 MHz segment of the band for new uses and applications such as rail applications.

It is our opinion that this option offers the best outcomes for the replanning process, however, we would suggest that with the segment supposedly set aside for the RMR utilisation needs further consideration. We would suggest that the segment should be approved for Local Area Wireless Broadband (LA-WBB) under apparatus licensing conditions as secondary utilisation for areas outside of the relevant railway corridors. This will then permit a higher utilisation of suitable WBB spectrum in regional and remote areas of Australia.

In closing, we would point out that we do have concerns regarding the present allocations and identification of technologies for the 1.9 GHz band, we would not be in favour of the removal of spectrum for link services without serious discussion on suitable alternatives, and the discussion should include both equipment availability and cost of replacement. Part of the equation must recognise that moving link allocations to higher frequencies will often lead to dramatically different link paths and consequently more equipment and site development costs as part of the process.



Our recommendations regarding identification of the technology for one specific use such as DECT (or its derivatives) is opening long term issues that could reflect poorly on the present review process. We do believe that with the change to SR WBB terminology and using Class licensing for that segment removes much of the risk. We do also believe that adapting the proposed RMR segment to permit LA-WBB outside of rail corridors is a method of increasing the public benefit of this spectrum segment.

Yours sincerely,
Australian Radio Communications industry Assn (ARCIA) Inc.

Ian Miller – Spectrum & Technical Officer