

**DB TELECOMMUNICATIONS PTY. LTD.**  
ACN 069 768 529

*TELECOMMUNICATIONS &  
IT CONSULTING SERVICES  
P O Box 216, Essendon, Vic 3040  
30 Elder Parade, Essendon, Vic 3040  
Telephone (03) 9331 3170  
Fax (03) 9331 3153*

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The Manager  
Major Spectrum Allocations Section,  
Australian Communications & Media Authority,  
PO Box 13112,  
Law Courts Melbourne Vic 8010

**Comments on Draft allocation and technical instruments for the 3.4/3.7 GHz bands auction**

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

**Spectrum Allocation Limits**

DB Telecommunications believes that a key driver behind the ACMA's decision to provide apparatus licensed spectrum in 3800 – 4000 MHz in metropolitan and regions, was recognition of the growing demand for mid-band spectrum to support the emerging market for private LA WBB systems.

The ACMA has indicated in the consultation paper that once it opens up applications for AWLs in the 3.8 GHz, spectrum licensees in the 3.4/3.7 GHz bands to apply for AWLs in the 3.8 GHz band for a period of time after the initial allocation window opens. This being done to provide operators of private LA WBB systems with priority access to the 3.8 GHz.

In order to maximise the amount of 3.8 GHz band available to operators of LA WBB systems in the longer term, DB Telecommunications that any AWL licences taken out by 3.4/3.7 GHz spectrum licensees should be included in their overall 3.4-4.0 GHz spectrum allocation limits in metropolitan and regional areas, e.g. 140 MHz or 160 MHz as suggested in the paper.

To date the lack of mid-band spectrum and the limited equipment options to support LA WBB solutions, e.g., readily available 5G SA solutions in some bands, is making it difficult for organisations to finalise their business cases and implementation plans for LA WBB systems. DB Telecommunications suspects that many of these organisations may not have their business cases and implementation plans ready when the AWL initial allocation window opens and may require additional time to submit their AWL applications.

To accommodate these factors, DB Telecommunications would recommend that the ACMA consider allowing a longer period of time, e.g. 12 months from the start of the initial allocation period, before the ACMA allows 3.4/3.7 GHz spectrum licensees to apply for AWLs in the 3.8 GHz band.

## **Additional Issue**


In its outcomes paper, the ACMA decided that the segment 3900 – 4000 MHz would be dedicated to restricted cell, LA WBB systems. DB Telecommunications interprets restricted cell to mean things like factory complexes, small campus style complexes, etc., but does find the distinction between restricted cell, LA WBB systems and more general LA WBB systems to be slightly grey.

DB Telecommunications would urge the ACMA to provide more clarification of this issue in its next consultation paper, in order to allow industry to make more informed decisions about which LA WBB systems should go in 3800 – 3950 MHz and which should go in 3950 – 4000 MHz.

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](mailto:dbritt@dbtelecomm.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. J. Britt'.

David Britt  
Director