

DB TELECOMMUNICATIONS PTY. LTD.
ABN 27 069 768 529

*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*

21 July 2023

The Manager
Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Comments on Draft frequency coordination requirements review work program 2023–24

DB Telecommunications Pty Ltd has been providing ACMA Accredited Frequency Assignment services to a range of commercial and government clients since 1998. The assignment services provided by the company cover land mobile, fixed link and WBB services across a broad range of frequency bands for clients in industries including Government, Emergency Services, Mining, Transportation, Manufacturing and Communications Service Providers

DB Telecommunications is pleased to be able to offer some brief comments on the Draft frequency coordination requirements review work program 2023–24.

Our comments largely relate to RALI LM08.

Completed work from 2021–22 review work program

We completed an initial internal study of the frequency distance reuse constraints for 400 MHz services. Preliminary results indicated some opportunities to reduce the frequency/distance constraints distance and, as a result, allow scope for more efficient allocation of services in congested areas. However, these opportunities are mostly limited to the assignment of simplex services, which are both low in number (with respect to duplex services) and declining in number.

Given that these reforms would be substantial, while not materially assisting in improving utility in congested segments/areas now or into the future, it was decided that no changes will be made to frequency distance reuse constraints for 400 MHz services at this stage (also see the [RALI LM08 page](#) on our website).

DB Telecommunications is concerned by the ACMA’s decision to not undertake any further changes to the frequency distance reuse constraints for the 400 MHz band.

The current constraints are contributing to an “artificial” 400 MHz spectrum shortage in the major capital cities. This has been an ongoing issue since LM08 was revised in 2015 and often makes it difficult to assign:

- High power two frequency services
- Low power two frequency services

- Low power simplex services

in the major capital cities.

The problems with the various frequency distance constraint tables in LM08 were detailed in DB Telecommunications' submission to IFC 26/2018 Spectrum Planning Framework – Frequency Coordination Requirements Review Work Program in 2018. A copy of that submission accompanies this submission to enable the ACMA to review those comments.

DB Telecommunications strongly disagrees with the ACMA's assertion that the number of simplex assignments is both low in number and declining in number.

DB Telecommunications estimates that around 60-70% of the assignments it performs in the 400 MHz band are for low power, sited ambulatory system licences. These types of assignments are in strong demand from companies in the construction, logistics, retail, and hospitality industries, to name a few, as they discover that class licensed CB radio does not provide a very reliable and secure means of communications for their businesses.

The addition of the Enclosed Service Model to LM08 has certainly assisted Accredited Persons to assign extra low power simplex services in inner city areas, but the Enclosed Service Model does not suit all applications. Many organisations need to use their handheld radios both indoors and in the external areas of their premises.

DB Telecommunications would strongly urge the ACMA to reconsider its decision not to undertake any further changes to the frequency distance reuse constraints for the 400 MHz band and to include this work in its frequency coordination requirements review work program for 2023–24.

RALI FX22

DB Telecommunications would like the ACMA to review the stringent adjacent channel protection ratios contained in FX22 for single frequency fixed links in the 800 MHz band particularly as they relate to Studio to Transmitter Links (STL).

DB Telecommunications would also urge the ACMA to allow more flexibility in the type of antenna that FX 22 requires for STLs in high density areas.


DB Telecommunications' concerns on these two issues were also detailed in its 2018 response to IFC 26/2018.

DB Telecommunications supports all other areas of the Draft frequency coordination requirements review work program 2023–24.

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.

Yours sincerely,

A handwritten signature in black ink, appearing to read "D. J. Britt". The signature is written in a cursive, flowing style.

David Britt
Director