

22 September 2014

Manager  
Spectrum Policy  
Department of Communications  
GPO Box 2154  
Canberra ACT 2601

By email: [spectrum@communications.gov.au](mailto:spectrum@communications.gov.au)

Dear Sir/Madam

**Consultation on draft Direction to use 3.5 GHz band spectrum for the NBN spectrum gap**

The Australian Subscription Television and Radio Association (ASTRA) welcomes the opportunity to comment on the draft Australian Communications and Media Authority (3.5 GHz frequency band) Direction 2014, which would require the ACMA to complete, by 30 April 2015, all steps necessary to enable apparatus licences of a type which would be appropriate for use for the National Broadband Network (NBN) to be issued in the 3.5 GHz frequency band.

The Australian subscription television (STV) sector makes significant use of fixed-satellite services operating in the adjacent 3.6-4.2 GHz band ('C-band'), including Foxtel, FOX SPORTS and Sky Racing. A wide range of programming delivered by Australian STV platforms is directly sourced from satellite feeds operating in the C-band, including from Disney, Discovery, BBC, Eurosport, Bloomberg, TCM, Cartoon Network, Boomerang, Sky News UK, Fox News, CNBC, Animal Planet, ESPN, Al Jazeera and CNN.

While ASTRA has no position on licensing arrangements in the 3.5 GHz band, we submit that the conditions of any licences issued in that band must include adequate protection from interference for satellite services operating in the 3.6-4.2 GHz band. C-band satellite receive facilities are very sensitive to interference and any impact from services operating in the adjacent 3.5 GHz band would have significant consequences for ASTRA members and Australian STV subscribers. As such, there should be provision for a minimum separation distance between the wireless bases and earth stations operating in adjacent bands. ITU studies have found this needs to be in the order of 2-5km.<sup>1</sup>

Please feel free to contact Simon Curtis, Policy and Regulatory Affairs Manager, on (02) 9772 2688 or [simon.curtis@astra.org.au](mailto:simon.curtis@astra.org.au) if you wish to discuss further anything in the above.

Yours sincerely



Andrew Maiden  
Chief Executive Officer

---

<sup>1</sup> See, for example, ITU Joint Task Group 4-5-6-7, *Sharing studies between IMT-Advanced systems and geostationary satellite networks in the fixed-satellite service in the 3 400-4 200 MHz and 4 500-4 800 MHz frequency bands in the WRC study cycle leading to WRC-15*, Document 4-5-6-7/TEMP/140-E, 28 February 2014.