

6 July 2012

Mr Andrew Clark
National Infrastructure, Government and Space Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

By email: WAS-planning@acma.gov.au

Dear Mr Clark

Submission on the *Planning for mobile broadband within the 1.5 GHz mobile band: An assessment of the current and potential future use of the 1427.9–1510.9 MHz band* discussion paper

The Australian Subscription Television and Radio Association (ASTRA) welcomes the opportunity to comment on the Australian Communications and Media Authority's (ACMA) review of current and future arrangements in the 1.5 GHz mobile band.

ASTRA has consistently supported the ACMA's Principles for Spectrum Management, including approaches to spectrum management that *enable and encourage spectrum to move to its highest value use or uses* (Principle 2) and that *balance the cost of interference and the benefits of greater spectrum utilisation* (Principle 5).

ASTRA recognises that spectrum demands to accommodate growing mobile broadband use are expected to increase significantly in the near future, and that 1.5 GHz band would appear to represent a promising opportunity for future spectrum allocations for short to medium term mobile broadband needs.

However, ASTRA notes that "highest value use" of spectrum cannot always be measured purely by the monetary value of spectrum for one use against another, and that overall flow-through value to the economy of different spectrum use should also be taken into consideration.¹ As such we request that, as part of its assessment of the 1.5 GHz band for mobile services, the ACMA take into account the potential for interference from mobile handsets to subscription television services delivered by satellite.

For further detail, we refer the ACMA to the submission by FOXTEL to this discussion paper.

Yours sincerely



Petra Buchanan
CEO

¹ For example, ASTRA has previously argued that while there may be short-term value in allocating C-Band spectrum for mobile wireless services, the impact on industries reliant on satellite communications must also be taken into account: ASTRA submission to the ACMA Earth Station Siting discussion paper, 21 October 2011 (<http://assets.astra.org.au.s3.amazonaws.com/cc0073884c5eec7ef95b5b86b6543840/ASTRAsubmissionACMAEarthStationSitingPaperFinal.pdf>)