

6 March 2015

Manager
Spectrum Engineering Section
Australian Communications and Media Authority

By email: freqplan@acma.gov.au

Dear Sir/Madam

The Australian Subscription Television and Radio Association (ASTRA) welcomes the opportunity to provide comments on the proposal to remake the Radiocommunications (Low Interference Potential Devices) Class Licence 2000 with variations.

ASTRA notes with interest the proposed changes to previous item 61 in Schedule 1 (outlined on page 7 of the Consultation Paper), which include the addition of frequency bands 3400-4800 MHz to the existing permitted operating frequency band for ultra-wideband (UWB) transmitters. The frequency range 3400-4800 MHz incorporates the C-Band.

We note that the ACMA previously consulted on an amendment of this kind in March 2014. At the time, ASTRA raised concerns that the proposed allocation may pose a potential risk to C-Band satellite services and requested ACMA refrain from making changes until evidence was obtained regarding the compatibility of UWB devices with C-Band Earth Stations.

We appreciate that the ACMA acknowledged these concerns and has undertaken further consideration of the issue. However, in concluding that the risk of interferences is 'minimal', the Consultation Paper makes only very broad references to 'overseas experience' and does not cite specific evidence or sharing studies to support this conclusion.

ASTRA would prefer there to be certainty on these issues and therefore requests the ACMA provide details of the evidence it has considered in coming to its conclusions, prior to going ahead with the proposed variation.

Please feel free to consult Holly Brimble, Policy and Regulatory Manager on 02 9776 2688 if you have any queries relating to the above.

Yours sincerely



Andrew Maiden
CEO