

16 May 2014



Manager
Broadcasting Carriage Policy Section
Radiocommunications Policy Branch
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Re: Draft RALI for 'early access' to 700 MHz spectrum

The Australian Subscription Television and Radio Association (ASTRA) welcomes the opportunity to comment on the draft 700 MHz band Early Access – Radiocommunications Assignment and Licensing Instruction for Public Telecommunications Services (RALI MS 36). ASTRA's comments relate to the potential interference to wireless audio devices operating in the 700 MHz band, and to subscription television set-top boxes.

Potential interference with wireless audio devices

The draft RALI notes that the *Radiocommunications (Low Interference Potential Devices) Class Licence 2000* authorises the operation of wireless audio devices (WAD) in the frequency ranges 520-820 MHz until the end of the re-allocation period for the 700 MHz band on 31 December 2014, and that WADs may potentially suffer co-channel or adjacent-channel interference from services operating under a Public Telecommunications Service (PTS) licence.

PTS licence applicants would be required to submit a WAD interference mitigation plan along with the licence application. ASTRA welcomes the requirement to submit a mitigation plan, and the items that must be covered in the plan, as detailed in item 3.2.1 of the draft RALI. ASTRA is concerned, however, that PTS licensee applicants would not appear to be required to consult with potentially affected WAD users during the development of a mitigation plan. WAD users will only be able to provide the PTS licensee with information on interference with WAD operations after deployment of fixed stations has occurred and transmissions have commenced.

ASTRA submits that a mitigation plan submitted for consideration as part of a PTS licence application should be available for inspection and comment by potentially affected WAD users before the ACMA determines the suitability of the plan as part of its consideration on issuing the licence. This would enable potentially affected WAD users to identify potential interference issues and minimise interference before new PTS services commence operation.

Possible interference to subscription television cable set-top boxes

There is the potential for 700MHz band transmissions to cause interference to subscription television cable set-top boxes (STBs), because some of the Foxtel Signal Carriers on the Telstra HFC network occupy radio frequency channels above 700MHz. The interference would be caused by way of ingress into the cable network or household wiring and/or STB. Whilst Foxtel and Telstra employ world's best practise shielding techniques in network design and installation it has been shown by studies conducted by Foxtel, and other



international studies, that interference due to ingress is possible from close-by transmissions.

Possible interference to terrestrial free-to-air reception

Foxtel operates a large number of MyStar STBs with terrestrial receivers for free-to-air channels—mostly in customer premises in regional areas of Australia. If problems arise with terrestrial reception by these STBs this drives calls to Foxtel’s contact centres, which increases costs for Foxtel.

The RALI identifies the risk of interference as a result of early 700MHz PTS transmissions to reception of digital television broadcasts in regions that have not been restacked. However, co-channel interference is not the only potential cause of interference to terrestrial reception. Even after Restack, masthead amplifier overload and adjacent channel interference are other possible causes of interference.

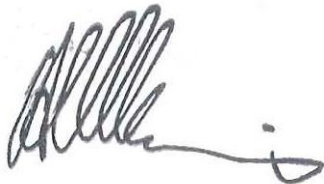
Notification to assist risk mitigation

As noted, interference risk would be reduced by not allowing transmission in an area until Restack has finished. However, should early transmissions be permitted, ASTRA requests that the ACMA notify, or a PTS licensee be required to notify, Foxtel prior to the commencement of new PTS transmissions, so that Foxtel is able to identify and mitigate against any potential interference with its STBs.

Specific notification is preferred over publication of a general timetable for early 700MHz PTS transmissions, as has been the approach to notification of the Restack timetable. Foxtel, because of the way it manages the provision of digital terrestrial television services to its MyStar customers, has been kept closely informed of the Restack timetable. ASTRA understands that it has been Foxtel’s experience that the Restack timetable has been subject to frequent amendment, which makes direct and advance notification preferable.

Please contact Simon Curtis, Policy and Regulatory Affairs Manager, on (02) 9776 2688, if you would like to discuss further anything in the above.

Yours sincerely



Andrew Maiden
CEO