

8 February 2019



**Mark Arkell**

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Dear Mark,

**RE: MS 44 Frequency coordination procedures for the earth station protection zones**

The Communications Alliance Satellite Services Working Group (SSWG) would like to thank the ACMA for the opportunity to comment on the proposed updates to RALI MS 44 *Frequency coordination procedures for the earth station protection zones*.

The SSWG reaffirms its support for the concept of protection zones, providing the appropriate certainty for satellite industry investments. The simplification of coordination requirements in protection zones are welcomed.

It should be noted that without an accompanying explanatory statement or rationale for the proposed changes in the draft RALI, the SSWG has had some difficulty in making an informed assessment and contribution. Having said that, it is noted that the changes appear to be predominantly machinery in nature and the SSWG offers the following comments.

With recent follow-up from the ACMA, the SSWG understands that the changes to RALI MS 44 are being made to include other satellite bands above 7 GHz, to have arrangements in place that preserve options for future potential earth station teleport sites in defined Earth Station Protection Zones on the eastern side of Australia, noting that Mingenew will be considered separately later and is currently protect by Embargo 49. The SSWG supports such an approach.

The scope of the draft MS 44 would benefit from further clarity. For example, the difference between the use of the terms 'proposed' and 'new' earth stations is not apparent.

As this consultation is related to the consultation on 'Frequency coordination requirements between microwave fixed point-to-point links and FSS earth stations (initial release covering 6 and 6.7 GHz)', it is suggested that a cross-reference to the 6/6.7 GHz RALI be inserted.

The ACMA website states that the '*proposed updates are to include additional frequency ranges in the frequency coordination procedures for earth station protection zones. The proposed updates support the removal of those frequency ranges from spectrum embargo 72.*' The ACMA notes that this is considered to be a blunt instrument that limits access within a defined radius of the Earth Station Protection Zones. For many services, in particular fixed links, this is unnecessarily restrictive. The changes to RALI MS 44 will replace the embargo with defined protection criteria. The SSWG supports the removal of the proposed frequency ranges from Embargo 72, making the observation that embargoes can be an impediment to industry innovation and progress in some situations.

The SSWG suggests that the proposed FS Protection Ratios are very conservative for the protection of modern digital FS with sophisticated error correction. The current Protection Ratios are essentially based on analogue FM fixed services. The SSWG would welcome the addition of information on how the proposed Protection Ratios were determined.

The SSWG suggests that the 12.75 to 13.25 GHz band should be included in the Earth Station transmit bands, noting that it is shown in the receive bands.

Finally, the SSWG draws your attention to an editorial correction, with an expectation that the ACMA will already be across these in the proofing stage:

- Page 9. Glossary. 'ITU International Telecommunication Union'

Thank you for your consideration of this submission. If you have any questions with regards to this response, please contact Mike Johns on (02) 9959 9125.

Yours sincerely,



John Stanton  
**Chief Executive Officer**