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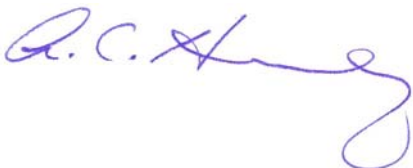
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To whom it may concern,

Please find attached ACIF's submission in response to the Strategies for Wireless Access Services Spectrum Planning Discussion Paper SPP 1/06.

Yours sincerely,



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**ACMA DISCUSSION PAPER - STRATEGIES FOR WIRELESS ACCESS SERVICES  
SPECTRUM PLANNING DISCUSSION PAPER SPP 1/06  
ACIF SUBMISSION**

**1 Introduction**

ACIF is pleased to have this opportunity to make a submission to the ACMA Discussion Paper SPP 1/06 'Strategies for Wireless Access Services'.

ACIF's membership comprises carriers/carriage service providers, business and residential consumer groups, industry associations and individual companies. Its mission is to provide leadership through a neutral forum, independent of individual interests, in which all Australian communications industry stakeholders cooperate in the development of initiatives that foster the effective and safe operation of competitive networks, the provision of innovative services and the protection of consumer interests.

ACIF operates on the central premise that the best outcomes for all stakeholders in Australian telecommunications can be achieved by co-operation. In this context, ACIF supports the policy objective of the *Telecommunications Act 1997* ('the Act') to promote the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.

The objective of ACIF's submission is to reinforce that policy underpinning of the Act and to outline examples of where industry-led solutions dealing with operational aspects of systems have to date enabled the efficient and effective utilization of services in Australia.

**2 The "private park" model**

One of the items of greatest interest to participants in the ACMA Wireless Spectrum Strategies seminar (convened to address matters in the ACMA discussion paper) was the model of the "private park".

As noted at the seminar by a few participants, the private park model requires additional information from ACMA before one is able to provide detailed comment on it. However one of the obvious areas of uncertainty is in the situation where multiple licenses (e.g. the "two to five" in the discussion paper) are issued in a geographic area. In this case there needs to be greater certainty in the processes for managing situations of conflict. For example, when two (or more) licensed organizations with competing interests experience interference between services.

The licensing arrangements for wireless equipment and services have traditionally relied on principles such as geographic exclusivity in certain bands (e.g. spectrum licenses for broadcasting or mobile phone services) or sharing of bands with accompanying "best effort" performance. These approaches obviously do not transfer to a private park where no one organization has

exclusive use of the relevant spectrum band but each licensed organization would expect a clear understanding of what might be its rights and responsibilities within the park.

This need for further clarity on rights and responsibilities could be addressed either by industry led agreements or by rules set by a regulator such as ACMA or by a mix of each approach. ACIF has highly relevant experience and expertise in facilitating industry led processes to establish the basic rules for interworking between organizations. ACIF's experience has shown this to be the best model for establishing the processes and procedures in such situations. Therefore ACIF believes industry led processes should be the basis for establishing rights and responsibilities for a "private park" model, should ACMA adopt such a model.

A prior example of ACIF's activity has been in the development of industry codes for services using the unconditioned local loop. This activity established the "rules" for the establishment, operation and transfer of unconditioned local loop services between service providers. Among other things, the rules guard against interference between multiple telecommunications services (e.g. PSTN, ADSL, etc) from multiple service providers. These services may be operating at the same or at different frequencies within close proximity of one another or on the same line.

### **3 Spectrum bands**

It is outside of ACIF's role to represent individual end user views on spectrum usage.

### **4 Conclusion**

There is a significant role for industry-led solutions in identifying the issues of emerging technology and network developments. ACIF has a history of successful responses to ULL issues, and is currently pro-actively working on issues in the emerging next generation networks.

There are lessons to be learnt from ACIF's experience in developing collaborative industry outcomes – the processes to be employed, the outcomes sought to be achieved, and the timeframes for achieving them, and the substantial commitment of industry resources required to achieve them.

The policy of the Telecommunications Act 1997 is to promote the primacy of industry self-regulation. ACIF's lengthy experience and substantial involvement in the industry activity on the ULLS, and leading pro-active outcomes to next generation network issues, means it is well placed to play a role in leading industry solutions.