

28 February 2022



Vaughan Barry

Senior Spectrum Planning Engineer
Space Systems Section
Spectrum Planning and Engineering Branch
PO Box 78
Belconnen ACT 2616

Email: Vaughan.Barry@acma.gov.au

Dear Vaughan

RE: Replanning the 2 GHz band: Review of the 2 GHz Television Outside Broadcast Frequency Band Plan

The Communications Alliance Satellite Services Working Group (SSWG) welcomes the opportunity to provide comments to the ACMA *Review of the 2 GHz Television Outside Broadcast Frequency Band Plan* Consultation paper.

Some background on use of earth stations and earth receive stations for Space Operation

The S-band frequencies are globally allocated for SPACE OPERATION (2025-2110 MHz Earth-to-space & 2200-2290 MHz space-to-Earth) and many satellite operators have used the S-band frequencies for Telemetry, Tracking and Control (TT&C). And the increasing demand for commercial and institutional missions in small to medium spacecraft with S-band TT&C has been a catalyst in the development of higher efficiency technologies for space applications such as simplified structures and reduced weights.

Under the Australian Radiofrequency Spectrum Plan, the 2025-2110 MHz and 2200-2290 MHz bands are allocated on a primary basis to the SPACE OPERATION, EARTH EXPLORATION SATELLITE, FIXED, MOBILE and SPACE RESEARCH.

New allocation

In the proposed *Draft - Radiocommunications (Television Outside Broadcasting) (2010–2110 MHz and 2200–2300 MHz) Frequency Band Plan 2022*, the operation of an earth station in the 2025 MHz to 2110 MHz frequency band and an earth receive station in the 2200 MHz to 2300 MHz frequency band may be a secondary service for the purposes of the spectrum plan and must not be used in the Perth area. The SSWG is concerned that there has not been any reason provided for this change in the consultation paper and seeks further clarification.

Issues for comment

The SSWG considers that the above proposal is likely to cause confusion on how best to manage interference between these stations, including new stations and other services and note that there is no secondary service in these bands under the 2021 Australian Radiofrequency Spectrum Plan (ARSP 2021).

The SSWG considers that discussion and consultation should be organised to see the potential impact of operating SPACE OPERATION as a secondary service on affected industries.

The SSWG encourages the ACMA to have the use of earth stations and earth receive stations for SPACE OPERATIONS studied separately, to ensure that SPACE OPERATIONS in this band are able to be protected and coordinated.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton', written in a cursive style.

John Stanton
Chief Executive Officer

About Communications Alliance

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see <http://www.commsalliance.com.au>.