

20 October 2020



**David Murray**

Director, Spectrum Access and Management  
Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 594  
Canberra ACT 2601

Email: <mailto:spectrumaccessandmanagement@communications.gov.au>

Dear David

**RE: Designation of spectrum in the 3.4 GHz band for spectrum licensing**

The Communications Alliance Satellite Services Working Group (SSWG) welcomes the opportunity to comment on the Department of Infrastructure, Transport, Regional Development and Communications *Designation of spectrum in the 3.4 GHz band for spectrum licensing* Consultation.

The members of the SSWG are comfortable with the proposed approach to designate the specified geographic areas and frequency ranges for spectrum licensing. We welcome the benefits to be derived from the efficiencies in aggregating spectrum for fixed and mobile terrestrial broadband use in the 3.4 GHz band.

The SSWG supports the approach to provide that apparatus licensing will still be available, for (up to) 65 MHz of spectrum in some regional areas and major regional centres, for fixed-satellite service (FSS) and amateur use as well as point-multipoint (PMP) licensing optimised for localised wireless broadband use.

The SSWG supports retaining access to the 3400 to 3442.5 MHz and 3475 to 3542.5 MHz frequency range for use by the FSS at the Moree, Roma and Uralla Earth station protection zones (ESPZs) and access to the 3475 to 3510 MHz frequency range for use by the FSS at the Quirindi ESPZ.

The SSWG would like to bring to the Department's attention the importance to the satellite community for this spectrum to be preserved and therefore the current procedure on ESPZs (i.e. <https://www.acma.gov.au/publications/2019-08/publication/frequency-coordination-procedures-earth-station-protection-zones>) need to remain valid. This would create a degree of certainty for its users and would assist in looking after the needs of future telemetry, tracking, and control (TT&C) operational stations serving satellite systems and networks for broadcasting and communications services.

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 that reads "John Stanton". The signature is written in a cursive style with a large, stylized initial "J".

John Stanton  
**Chief Executive Officer**

### **About Communications Alliance**

Communications Alliance is the primary telecommunications 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, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:

<http://www.commsalliance.com.au/>