

20 November 2013

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Dear Juan

**Re: Fixed LCD to support access to the 28 GHz band by apparatus licensed services**

Communications Alliance welcomes the opportunity to make a submission on the ACMA TLG Consultation Paper on amending the Fixed LCD to support access to the 28 GHz band by apparatus licensed services.

In summary Communications Alliance supports the approach being proposed by the ACMA TLG in this paper. We have noted in our response that concerns with respect to the coordination of the point-to-multipoint systems with satellite systems can be addressed by providing appropriate guidance in the relevant RALI when considering extending the proposed operation of point-to-multipoint systems conditions to cover the range 26.5 to 31.3 GHz.

The responses to the individual questions posed in the Consultation paper have been attached to this letter.

If you have any further questions with regards to the points raised in this submission please contact Mike Johns on (02) 9959 9125.

Yours sincerely

A handwritten signature in black ink that reads "John Stanton".

John Stanton  
**Chief Executive Officer**

## Industry response to questions

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### **1. The ACMA considers that conditions in Part 3 of the Fixed LCD could restrict deployment of wideband point-to-multipoint systems in the 28 GHz band. Stakeholder commentary is welcome on this view.**

Communications Alliance generally concurs that Part 3 of the Fixed LCD is unduly restrictive, noting the following comments with respect to the need for coordination of the point-to-multipoint systems with satellite systems which can be addressed by providing guidance in the relevant RALI.

### **2. The ACMA invites views on its proposed conditions for operation of point-to-multipoint systems in the 28 GHz band.**

Communications Alliance agrees with proposed conditions but also note that 'adaptive transmit power control' may be implemented in alternative ways. For example, LTE systems use a defined closed-loop transmit power control (TPC) mechanism. All such alternative mechanisms should be acceptable if they offer equivalent functionality.

### **3. The ACMA invites views on its proposal to amend the Fixed LCD to apply conditions on the operation of point-to-multipoint systems in the 26.5–31.3 GHz frequency range.**

Communications Alliance agrees with extending the proposed conditions to cover the range 26.5 to 31.3 GHz. Concerns about coordination of the point-to-multipoint systems with satellite systems can be addressed by providing appropriate guidance in the relevant RALI.

The reason for this change is that we do not wish to prejudge what coordination arrangements would be most appropriate in the RALI.

### **4. The ACMA welcomes stakeholder views on whether any further amendments of substance are required to the Fixed LCD to facilitate operation of point-to-multipoint systems in the 28 GHz band.**

Communications Alliance offers no comment on this issue.

### **5. The ACMA welcomes stakeholder views on whether it is appropriate to delete Part 3D from the Fixed LCD.**

Communications Alliance does not object to this removal of the outdated provisions.

**6. The ACMA welcomes stakeholder views on its proposal to repeal the instruments relating to spectrum licensing in the 28 GHz band.**

Communications Alliance supports repealing the instruments associated with the expiring Spectrum Licences in 28 GHz band.

**7. The ACMA welcomes stakeholder views on its proposal not to make any amendments to the Radiocommunications (Communication with Space Object) Class Licence 1998.**

Communications Alliance notes that the frequency bands 28.5 to 29.1 GHz and 29.5 to 30.0 GHz are included in the *Radiocommunications (Communication with Space Object) Class Licence 1998*, and strongly supports the position of no change.

**8. The ACMA welcomes stakeholder views on the proposal not to amend any of the instruments relating to 27 GHz band spectrum licences at this time.**

Communications Alliance agrees that no change is needed to current instruments relating to Spectrum Licences in 27 GHz band.