

14 June 2019



The Manager

Major Spectrum Allocations Section
Spectrum Allocations Branch
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Dear Madam/Sir,

RE: Consultation Paper – Introduction of 112 MHz channels for fixed point-to-point links in the 38 GHz band

The Communications Alliance Satellite Services Working Group (SSWG) thanks the ACMA for the opportunity to comment on this Consultation Paper.

General remarks

This consultation forms an integral element of the replanning process in the 28 GHz band and it is, indeed, key to a successful outcome for the future of the 28 GHz band.

The proposals put forward by the ACMA in the Consultation Paper are sensible and, we believe, will contribute to the highest value use of spectrum.

As outlined in our submission to the 28 GHz process, the SSWG has as a priority protecting the future dependence of its members on the 28 GHz band. We commend the ACMA for taking steps on this particular element.

The current limited usage of the 28 GHz band by point-to-point services makes it very timely to consider the benefits of those services being relocated to 38 GHz as proposed in the Paper. At the same time, it appears that a more palatable channel arrangement involving 112 MHz channels is feasible and would meet more contemporary demands of point-to-point users.

Issues for comment

The SSWG supports the 112 MHz channel arrangements proposed by the ACMA together with the grandfathering of lower capacity channels. 100 MHz channels may also attract the interest of the IMT community in the broader sense of the 37 – 43.5 GHz range of frequencies. Developments in this band, taken together with the 26 GHz and 28 GHz bands, should be seen as interchangeable and holistic, leaving the 28 GHz band to develop and flourish with satellite broadband services and enhanced satellite mobility.

The SSWG supports the 112 MHz proposal at 38 GHz and encourages this as a permanent 'home' for point-to-point services in order to satisfy an apparent growing demand for this channel capacity and as an alternative to the 28 GHz band which is highly important to the FSS and a focus of intense investment and valued use of this spectrum.

The grandfathering arrangements for lower capacity channels reflect greater demand for broadband. It is assumed that grandfathering arrangements would be consistent between the 28 GHz and 38 GHz bands. However, while the SSWG has no particular concerns for channel arrangements, it is clear that highest value use of spectrum is attainable where coordination is possible and achievable. In this regard, coexistence with FWA in 38 GHz shows a way forward to greater spectrum efficiency at 38 GHz. The profusion of ubiquitous services in the FSS in 28 GHz is not a recipe for efficient coexistence.

The SSWG commends the ACMA for what appears to be a good engineering effort with respect to protection ratios for 112 MHz channels or exceedance times for fade margins. The Group has no technical feedback to offer on this issue.

The SSWG looks forward to continuing to engage with the ACMA on this and associated spectrum-related consultations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton'. The signature is written in a cursive style with a large initial 'J'.

John Stanton
Chair, SSWG