

10 February 2016



Nevio Marinelli

The Manager
Spectrum Planning Section
Spectrum Planning and Engineering Branch
Australian Communications and Media Authority
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Dear Nevio,

Re: Expiring spectrum licences—technical framework for the 2 GHz band

Communications Alliance welcomes the opportunity to provide comments to the ACMA on the *Expiring spectrum licences—technical framework for the 2 GHz band* Consultation Paper.

The Communications Alliance Satellite Services Working Group (SSWG) is a grouping of satellite-related companies active in the Australian market and includes satellite operators, satellite service providers, manufacturers and ground-segment installers. In providing this industry response we note that some of our members may be submitting their own responses.

Communications supports the ACMA's proposed revised technical framework as outlined in the Consultation Paper, noting that Part 3 on the Mobile Satellite Service (MSS) appears to remain unchanged. However, Communications Alliance would like to suggest that the issue of future proofing adjacent channel interference would also need to be addressed as a part of this framework.

Whilst the purpose of the consultation paper is to seek the feedback of individual stakeholders to inform the ACMA of any impacts of the proposed changes in their individual circumstances, given that the guidelines will apply to a 15 year time period in the spectrum licence, it would be prudent to future proof adjacent channel interference arrangements for what could develop over that period of time.

In this regard, the SSWG notes that Annexes 1 and 2 of ECC Decision (06)01 '*The harmonised utilisation of the bands 1920-1980 MHz and 2110-2170 MHz for mobile/fixed communications networks (MFCN) including terrestrial IMT systems*' (November 2012 Amendment) sets out updated channel planning arrangements for fixed and mobile communication base stations in the 1920-1980 MHz and 2110-2170 MHz bands. Annex 1 identifies the channel block sizes and distance between the upper/lower blocks and the edges of each band (including the edges bordering with the MSS uplink and downlink bands), and Annex 2 defines the emission mask that applies outside each block.

As a part of this consultation, Communications Alliance suggests that the ACMA may wish to consider the 2 GHz boundary arrangements between mobile and MSS services in Europe, as outlined in the November 2012 amendment to ECC Decision (06)01.

If you have any further questions with regard to this response, please contact Mike Johns on (02) 9959 9125.

Yours sincerely,

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

John Stanton
Chief Executive Officer