

23 August 2021



**Bridget Kerans**

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Dear Bridget

**RE: Spectrum planning framework - Draft frequency coordination requirements review work program 2021–2**

Communications Alliance welcomes the opportunity to provide comments on the ACMA's *Spectrum planning framework - Draft frequency coordination requirements review work program 2021–22* consultation.

The Satellite Services Working Group wishes to provide the following comments on the ACMA's proposed Work program for revising the frequency assignment and coordination documents:

**FX03 Microwave fixed services frequency coordination including information on RPE data files**

Revision: Q3–Q4 2021

The SSWG will review details as part of the TLG process for 3700–4200 MHz.

The SSWG supports coordination processes and protection criteria being included between FSS and FS in this RALI (e.g. 3580–4200 MHz & 5925–6425 MHz C-bands, 10.7–11.7 GHz, 12.75–13.25 GHz Ku-bands, 17.7–19.7 GHz, 27.5–29.5 GHz Ka-bands etc) from the relevant ITU-R Recs. including ITU-R SF.1006 & SM.1448-1. Protection of FSS feeder links is particularly important to the SSWG.

See MS45 for relevant level of details.

**FX14 Point-to-multipoint fixed services in specified parts of the 3.4–3.5 GHz band**

Revision: 3400–4000 MHz TLG process commenced Q2 2021, finishing Q4 2021

The SSWG has a particular interest in the coexistence between Point-to-multipoint (PMP) and other services. The SSWG wishes to be involved in the review of the document that replaces FX14 in this area.

**FX19 Frequency coordination and licensing procedures for apparatus licensed broadband wireless access services in the 1900–1920 and 3575–3700 MHz bands**

Revision: 3400-4000 MHz TLG process commenced Q2 2021, finishing Q4 2021

The SSWG will review details as part of the TLG process. This includes protection criteria for 3575-4200 MHz ES RXs, including guard bands, interference thresholds, separation distances and emission masks.

**MS38 Coordination between earth station transmitters in the fixed-satellite service and other services in the 25.5–30 GHz band**

Revision: Q3–Q4 2021

The SSWG wishes to be involved in the review of this document.

**MS39 Frequency coordination and licensing procedures for apparatus licensed public telecommunications services in the 3.5 GHz band**

Revision: 3400–4000 MHz TLG process commenced Q2 2021, finishing Q4 2021

The SSWG will review details as part of the TLG process.

**MS44 Frequency coordination procedures for the earth station protection zones**

Revision: Q3-Q4 2021

As users of Earth Station Protection Zones (ESPZs), the SSWG wishes to be involved in the review of this document.

**MS45 Frequency coordination requirements between microwave fixed point to point links and FSS earth stations**

Revision: Q4 2021-Q1 2022

The SSWG wishes to be involved in the review of this document.

Protection of FSS feeder links is particularly important to the SSWG in the 5925 to 6425 MHz band.

**MS46 Licensing and coordination procedures for area-wide apparatus licensed services in the 26/28GHz bands**

Revision: Q3-Q4 2021

The SSWG wishes to be involved in the review of this document. Of particular interest is development to the current Area-wide Apparatus Licence (AWL) arrangement.

**MS03 Spectrum Embargoes**

Revision: Next 12 to 18 months

The SSWG wishes to be involved in the review of Embargoes that impact FSS/MSS:

- Embargoes 23 (MSS), 42 (FSS), 48 (FSS), 72 (FSS), 78 (FSS), 79 (FSS).

Embargo 78 needs to be amended now to allow new FSS assignments in the 3800 to 4000 MHz range, especially at existing earth station sites, now that the ACMA has released their *Replanning the 3700-4200 MHz band* Outcomes paper.

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 'J Stanton', written in a cursive style.

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/>