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AMTA Submission

Australian Communications & Media Authority

RLAN use in the 5 GHz & 6 GHz bands



About AMTA

The Australian Mobile Telecommunications Association (AMTA) is the peak industry body representing Australia's mobile telecommunications industry. Its mission is to promote an environmentally, socially and economically responsible, successful and sustainable mobile telecommunications industry in Australia, with members including the mobile network operators and service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry. For more details about AMTA, see <http://www.amta.org.au>.



Overview

AMTA welcomes the opportunity to provide comments in response to the ACMA's consultation on RLAN use in the 5 GHz and 6 GHz bands.

AMTA broadly supports the investigation of the 6 GHz band for RLAN use and considers the ACMA may move to consulting on a formal variation to the LIPD class licence.

AMTA also supports the ACMA in considering the upper 700 MHz for allocation to IMT, with a review to be considered following the outcomes of WRC-23. We also anticipate that future demand may require spectrum licensed and/or unlicensed arrangements to be introduced in this part of the band. This demand will be driven by the ongoing exponential growth in customer data consumption and demand for ever-faster speeds and higher quality delivery of telecommunication services.

Responses to Questions from the options paper:

1. What is the demand for spectrum for RLAN use in the 6 GHz band (5925–7125 MHz)?

AMTA considers that demand exists for both licensed and unlicensed use in the 6 GHz band. AMTA's position is that there is a need for more mid-band spectrum to be allocated for IMT, as recently noted in our response to the ACMA's consultation on the 3700-4200 MHz band.

Low band spectrum provides wide area coverage and good depth of coverage but has limited capacity. High bands can provide very high capacity over a localised area. Mid-band spectrum stands in the middle as a balance between coverage and capacity and is critical to meet forecast demand for mobile broadband. AMTA members agree that mid-band spectrum is their highest priority for the ACMA's forward allocation workplan, as outlined in our submission to the 2021-26 FYSO consultation.

2. Should the ACMA proceed, as proposed, to consult on a formal variation to the LIPD class licence that adds the frequency range 5925–6425 MHz for RLAN use, bounded by the parameters described in the ACMA's preliminary view section of this paper?

AMTA agrees that the lower 500 MHz (5925-6425 MHz) may be made available for use in Australia under the LIPD Class Licence and that these devices could be allowed to operate at two different power limits:

- i. 24 dBm (11 dBm/MHz) if only used indoors (i.e. 'Low Power Indoor' devices)
- ii. 14 dBm (1 dBm/MHz) in all locations (i.e. 'Very Low Power' devices)

4. Is it appropriate to consider inclusion of the upper 6 GHz band (6425–7125 MHz) in the LIPD class licence or should this be deferred to monitor future developments (for example, in the wide-area International Mobile Telecommunications (IMT) space) as outlined in the ACMA’s preliminary view? We invite comments from submitters on the utility of the band for IMT use.

AMTA considers that there is demand for both licensed and unlicensed use in the band and we strongly recommend that the ACMA gives due consideration to an allocation for IMT in the upper sub-band (6425-7125 MHz). Indeed, additional spectrum is required in the timeframe 2025-2030 as per a recent Coleago study¹ and this spectrum could be found in a variety of mid-band ranges. Due consideration of IMT in the upper 6 GHz sub-band cannot commence until after WRC-23 Agenda Item 1.2 has investigated the technical feasibility of operating IMT in that sub-band. AMTA proposes that consideration of an amendment to the LIPD class licence for outdoor deployment of Wi-Fi in the upper 6 GHz sub-band cannot commence until after WRC-23 concludes.

Contact:

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¹ [The 6GHz Opportunity for IMT - Coleago - 1 Aug 2020.](#)

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