



Australian Government

**Department of Broadband,
Communications and the Digital Economy**

Digital dividend green paper—submission cover sheet

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Title	Convenor – Technical Sub-Committee
Name	Ian Miller
Organisation	Australian Radio Communications Industry Association
Prefer contact by	Email
Email address	Ian.miller@aaradio.com.au
Street address	c/- AA Radio Services Pty Ltd., 28 Trade Place,
Suburb	Vermont
State	Victoria
Post code	3133
Country	Australia
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Australian Radio Communications Industry Association
PO Box 1151, Hartwell, Vic 3124

ACMA Spectrum Review Working Group
Ian Miller – Convenor
Phone (03) 9264 8333

25th February 2010

The Manager,
Wireless Satellite and Digital Dividend Section
Department of Broadband, Communications and the Digital Economy,
GPO Box 2154
Canberra ACT 2601

Dear Sir/Madam,

Reference – Digital Dividend discussion paper

This organisation represents a significant segment of the radio communications market in the design, manufacture, delivery and support of business critical and mission critical communication systems. Our industry and members are totally focused and support these organisations that range from first responders, essential transportation, security and small business who rely totally on the provision of “instant, must work, radio communications” to function. Many of these users cannot operate or deliver these essential services without radio communication services of which presently primarily exist within the 403-520 MHz spectrum.

We are pleased to be able to take part in the process of consultation with regard to the several 'Digital dividend Paper' currently being undertaken. At this point in time we are concerned that much of the discussion of the benefits to be gained is oriented towards the 'high profile' areas of mobile telephony and digital broadcasting. We do sincerely believe that the following markets should also be considered, even if it is just at reserving portions of the re-claimed spectrum for future allocation as technology develops the product suites to suit the productivity gains that can be achieved.

The sectors we believe that must be considered are -

- Broadband data transmissions for the Public safety markets, such as that utilised in the United States and identified as the 700 MHz spectrum, it is essential for the Public Safety sector to be able to utilise these type of technologies as part of their operational communications.
- A similar sector of spectrum should also be held aside for other Industries for the same applications, this will be of particular interest to the transport and mining sectors who would prefer to be able to operate their own dedicated communications networks rather than have to operate on the 'Public Carrier' or cellular systems



- The telemetry and Scada Industry who provide a high level of control and monitoring of essential service infrastructure. If spectrum is made available many of the manufacturers in this market segment would then develop products and applications to improve the business efficiency of many of our existing infrastructure projects, even to the extent of being able to provide visual or CCTV monitoring of remote locations.
- The remote control of applications in the mining industry - at present there are a plethora of equipment applications being presented that utilise the 'licence free' areas of spectrum such as at 2.4 GHz, however, as more and more systems come on line this section of the spectrum will become unworkable and the ability to have a section of spectrum dedicated to such mining and heavy industry applications would greatly enhance the efficiency of those industries without them having to compete for spectrum with the general population. It is of particular concern that many of the applications within the mining industry are essential components of the 'safe working' systems within the mines and as such there is potential for a very real negative effect on the Export Earnings of this industry, a key component in the Gross Domestic Product of our country.
- In Australia, congestion and supply problems currently exist with crane control and motor vehicle entry systems due to the shared use of 433MHz and 900MHz class licensed low power device (LIPD) allocations and the situation is becoming untenable. It is desirable that the European 868MHz band allocations for such services be made available for use in Australia. Until now potential users and importers of devices using this band (or vehicles/ cranes having them already fitted) have faced a definite no from the regulator to their requests for the use of such allocations. This may be because the spectrum is already earmarked for expansion of cellular services. If this is the case, then the opportunity now exists for a portion of spectrum to be made available near the 868MHz allocation possibly using the digital dividend. Such spectrum, if allocated high enough in the band, could enable the introduction of existing products to the Australian market, with minimal design change, to provide much needed relief for the operation of such services. Such a measure would provide substantial benefit to the Australian public and also stimulate increased design, marketing and operational opportunities for industry. This matter should be given strong consideration since it parallels significant work recently done by the ACMA to ensure spectrum becomes available in Australia to align with an "international allocation" in the 5.9GHz band to facilitate the operation of intelligent transport systems. It would be a pity if Australia restricted international trade by not also addressing the supply of compatible lower frequency/power level requirements for the same product.

It would appear on the surface that at present there is little demand for those type of applications, but this is as a result of little usable spectrum being available and Australian initiative will soon see applications for all of the above requirements once there is spectrum allocated to the purposes. There is no doubt that if there is serious discussion held with regard to the above areas there will be much Interest. It is only through representations by Industry bodies such as ours that many of the potential suppliers/users are beginning to realise that such needs can be met from the 'Digital dividend'.



Our organisation strongly supports the concept of change and adoption of new technologies and by reserving some of the spectrum gained from the Digital Dividend then the Government can be seen to be allowing for new technologies and yet not compromising the quality or flexibility of the present spectrum. We strongly recommend that provision should be made within future discussions for allocations to be made for such essential services as the Public Safety broadband data systems, as well as the other applications we have outlined. As always, as a representative body we would welcome the opportunity to be involved in the process going forward.

Yours sincerely,
ARCIA Spectrum Review Working Group

Ian Miller - Convenor