

3 September 2012



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Victoria Robertson
Manager, Spectrum Outlook and Review Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

By email: spectrum.outlook@acma.gov.au

Dear Ms Robertson,

RE: AMTA Comments on Review of the 2.5 GHz band and long-term arrangements for ENG – Conversion Plan July 2012

AMTA welcomes the opportunity to comment on the Conversion Plan and, we are happy to elaborate on the points below if it would be of assistance to the ACMA.

Since the World Radio Conference 2000 the 2.5 GHz band has been internationally harmonised for IMT use. AMTA suggests that Australia must consider the international arrangements in the re-planning and licensing of the 2.5 GHz band, and in particular, build maximum flexibility into the licensing arrangements for the mid-band gap.

That said, AMTA supports the ACMA's conversion plan for the 'mid-band gap', (2570 to 2620 MHz), to be allocated for use by TOB use in the medium term as well as provide an opportunity for potential future TDD use.

For this reason, TOB spectrum licences in the mid-band gap could be issued for a term of 15 years, in alignment with other licences in the band. However, we would strongly recommend that this is subject to the licences being technology neutral rather than conditioned only for TOB services. AMTA also suggests that there should be a review of the allocation part way through the term of the 15 year spectrum licences.

AMTA maintains that it is desirable to identify spectrum to meet the future requirements of mobile broadband and that as there is potential for TOB services to migrate, at least in part, to mobile broadband services and other emerging technologies using other bands, it would be prudent to make the spectrum licences for the mid-band gap technology neutral.

Finally, AMTA supports the ACMA setting co-ordination criteria for collection stations for broadcasters operating in the 2.5MHz mid-band gap, as well as the proposed registration process for collection station locations as this will assist in network planning and the management of potential interference.

Yours sincerely,

A handwritten signature in black ink that reads "Chris Althaus". The signature is written in a cursive, flowing style.

Chris Althaus
CEO, AMTA