

5 May 2022

The Manager
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To Whom it May Concern,

Proposed spectrum re-allocation declaration for the 3.4 GHz and 3.7 GHz bands

I am writing to you today to express the views of the airport sector on Australian Communications and Media Authority (ACMA)'s proposed declaration to re-allocate radio frequency spectrum in the 3.4 GHz and 3.7 GHz bands (the Proposal).

The Proposal will have a potentially significant effect on the safe operation of aircraft at airports across Australia's aviation network as the rollout of 5G telecommunications continues apace.

The Australian Airports Association (AAA) represents the interests of more than 330 airports and aerodromes across Australia, in addition to more than 120 corporate members supplying products and services to airports. The AAA also represents over 200 regional and remote airports and aerodromes, many of which rely either on ground-based or onboard radio navigation aids to allow pilots to make safe approaches and landings.

On behalf of all its members, the AAA welcomes the opportunity to comment on the Proposal. In doing so, the AAA endorses the submissions made to this consultation by its major airport members, such as Brisbane and Sydney airports, which, as two of Australia's largest international gateway airports will be most directly affected by the proposal due to sensitivities from international airlines.

1. Firstly, it is important for ACMA to acknowledge the feedback provided to its Technical Liaison Group (TLG) in January 2022 from the Radio Altimeter Coordination Group (RA-CG) on the potential safety implications of the Proposal's reallocation of spectrum. The RA-CG includes representation from the Civil Aviation Safety Authority (CASA), airports and peak bodies for pilots and specialist aviation users such as police and emergency services.
2. Secondly, ACMA should improve its Proposal by working with CASA through the RA-CG and ACMA's TLG to find appropriate mitigations to potential 5G interference on safety critical systems onboard aircraft and at airports. ACMA can apply a best practice approach to mitigation by drawing upon the local and international technical experience available through the RA-CG's member organisations and CASA.
3. Thirdly, ACMA should ensure mitigations are in place so the 5G spectrum does not interfere with safety-critical aviation functions in regional and remote Australia, particularly round airports, aerodromes and airstrips where aircraft regularly operate at low altitudes in a range of aeromedical, firefighting and public transport functions.

4. The AAA also endorses the interim mitigations identified by Sydney and Brisbane airports in their submissions. These mitigations have the potential to limit any potential negative impacts on aviation brought about by the proposed re-allocation of the 5G spectrum, which include:
- Establishing an exclusion and /or restricted operating area in and around airports. Canada and France have adopted such areas;
 - Reducing transmitter power in in the vicinity of airports or in the vicinity of airport flight path approaches. France has adopted this measure;
 - Angling 5G tower antennas tilted downward to reduce potential interference with aircraft equipment. France has also adopted this measure; and
 - Fitting more modern radio altimeters to existing aircraft.

ACMA previously identified some of these mitigation measures in the consultation papers issued as part of its Proposal.

On behalf of its members, the AAA urges ACMA to consider implementing such mitigations, even on an interim basis, until more precise information on the interactions of 5G signals on safety critical aviation systems in Australia and internationally becomes available.

The AAA also believes it is important for there to be a whole-of-government approach to addressing these vitally important issues. Given that both ACMA and CASA are statutory authorities under the umbrella of the Department of Infrastructure, Transport, Communications and Regional Development (the Department), it is vital that both organisations work together with the Department to achieve the right outcome for both the rollout of a new telecommunications technology and maintaining Australia's globally respected record on aviation safety.

Should your office require further information please contact Scott Martin, Director Policy and Research (smartin@airports.asn.au) or 0437 285 739.

Yours sincerely,

James Goodwin
Chief Executive