IEEE P802.18
Radio Regulatory Technical Advisory Group (RR-TAG)

Draft response to Australia ACMA's consultation "Remaking the low interference potential devices class licence"				
Date: 2025-05-01				
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This document contains a proposed response to Australia Communications and Media Authority (ACMA)'s consultation "Remaking the low interference potential devices class licence".

Electronic filing May 16, 2025

Re: Consultation "Remaking the low interference potential devices class licence"

Dear Respected Officer,

IEEE 802 LAN/MAN Standards Committee (LMSC) thanks Australian Communications and Media Authority (ACMA) for providing an opportunity to comment on the consultation "Remaking the low interference potential devices class licence".

IEEE 802 LMSC is a leading consensus-based open standards development committee for networking standards that are used by industry globally. It produces standards for networking devices, including wired and wireless local area networks ("LANs" and "WLANs"), wireless specialty networks ("WSNs"), wireless metropolitan area networks ("Wireless MANs"), and wireless regional area networks ("WRANs"). Technologies produced by implementers of our standards are a critical element for all networked applications today.

IEEE 802 LMSC is a committee of the IEEE Standards Association and of Technical Activities, two of the Major Organizational Units of the IEEE. IEEE has over 460,000 members in more than 190 countries and its core purpose is to foster technological innovation and excellence for the benefit of humanity. IEEE is also a major accredited standards development organization whose standards are recognized worldwide. In submitting this document, IEEE 802 LMSC acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of IEEE 802 LMSC. Therefore, this submission should not be construed as representing the views of IEEE as a whole[1].

IEEE 802 LMSC applauds ACMA for not only remaking the existing class licence but also introducing new arrangements into the LIPD class licence to facilitate the use of emerging technologies.

Frequency hopping radio communications transmitters in the 5925 MHz to 6425 MHz band

IEEE 802 LMSC supports revision of regulation for Low Interference Potential Devices to facilitate a broader range of applications. We observe that the introduction of higher power spectral density by narrowband frequency hopping devices may result in increased interference for IEEE 802.11 based Wi-Fi devices. In this regard, IEEE 802 LMSC respectfully asks ACMA to consider introducing a requirement of channel access mechanism for any narrowband frequency hopping radio communications transmitter with the objective of enhancing coexistence with other LIPDs operating at the same frequency band. As an illustrative example, ETSI EN 303 687[2] requires RLAN devices to use a Listen Before Talk (LBT) protocol to ensure effective and efficient use of the frequency band, and ETSI BRAN has an active Work Item[3] for developing a channel access mechanism for Narrowband Frequency Hopping equipment operation. In addition, FCC 47 CFR

[1] This document solely represents the views of IEEE 802 LMSC and does not necessarily represent a position of either the IEEE or the IEEE Standards Association or the IEEE Technical Activities.

[2] See Section 4.3.6.3.2.1, EN 303 687 (6 GHz WAS/RLAN; Harmonised Standard for access to radio spectrum), version 1.1.1.

[3] Technical Committee (TC) Broadband Radio Access Networks (BRAN) Activity Report 2023, https://www.etsi.org/committee-activity/activity-report-bran. [accessed: 30 April 2025]

part 15[4] requires the use of a contention-based protocol for all U-NII transmitters, except for standard power access points and fixed client devices, operating in the 5.925-7.125 GHz band.

IEEE 802 LMSC respectfully requests ACMA to revise Clause 42 (Additional limitations for table item 5) of the draft Radiocommunications (Low Interference Potential Devices) Class Licence 2025 by adding the fifth limitation as follows:

A radiocommunications transmitter must use a channel access mechanism that mitigates interference to other users of the spectrum.

Conclusion

IEEE 802 LMSC thanks ACMA for the opportunity to provide this submission and respectfully asks ACMA to consider adding a new requirement on the use of contention-based protocols for any narrowband frequency hopping radio communications transmitter.

Respectfully submitted,

By: /ss/.
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[4] See §15.407(d)(6), FCC 47 Code of Federal Regulations part 15 (Radio Frequency Devices).