



Ms Rachel Blackwood

A/g Assistant Secretary  
Spectrum & Telecommunications Deployment Policy Branch  
Department of Infrastructure, Transport, Regional Development and Communications  
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***Australian Space Agency consultation submission - exposure draft of the Radiocommunications Legislation Amendment (Reform and Modernisation) Bill***

Dear Ms Blackwood,

On behalf of the Australian Space Agency (the Agency), I would like to thank the Department of Infrastructure, Transport, Regional Development and Communications (the Department) for the opportunity to comment on the *Radiocommunications Legislation Amendment (Reform and Modernisation) Bill 2020's* exposure draft.

The Agency was established to transform and grow a globally respected Australian space industry that lifts the broader economy, inspires and improves the lives of Australians – underpinned by strong national and international engagement. The Government has set a target to triple the size of the Australian space sector from \$3.9 billion to \$12 billion and create another 20,000 jobs by 2030. The path to achieve this vision is outlined in the Australian Government's *Advancing Space: Australian Civil Space Strategy 2019-2028* (the Strategy).

Spectrum and access to it underpins Australia's growing space industry. An emerging wave of lower-cost, miniaturised communications hardware can be sent into orbit cheaper and faster than ever before and is enabling an even greater number of industry sectors to affordably access space. As a result, and as outlined in the Strategy, space technologies are playing an increasingly important role in many areas of Australia's economy, from supporting agriculture, transportation and drought through to disaster management.

The Agency congratulates the Department on its work at modernising the existing radiocommunications framework and is encouraged to see the exposure draft's effort to streamline many aspects of the Radiocommunications Act (the Act). The closer alignment of the apparatus and spectrum licence types will enable the Australian Communications and Media Authority to allocate spectrum more efficiently while providing greater certainty for industry. The proposed changes are also consistent with the new simplified objective of the Act in promoting the long-term public interest derived from the use of spectrum.

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While the allocation of spectrum has always had the public interest as part of its consideration, the Agency is particularly interested to see how this will practically be implemented when determining if an apparatus licence is granted for 10 years or more. It will be important to balance long-term certainty with the spectrum needs of an agile and quickly evolving space industry.

The Agency notes that similar to the reform of the *Space (Launches and Returns) Act 2018* which commenced on 31 August 2019, the modernisation of the spectrum management framework looks to ensure Australia's radiocommunications legislation can support technology advances and innovation while insuring Australia's national interests.

This consultation has also asked about the possible changes the Department should consider as part of future reforms to the spectrum management framework. To this extent Agency would like to highlight the current inconsistency in the frequency range covered by the Act and that which is internationally recognised by the International Telecommunications Union (i.e. 420 THz as opposed to 3THz at an ITU level) and the impact this may have on future optical communications systems. While aligning these values is possibly beyond the scope of this reform the Agency would like to be actively engaged with the Department around this aspect.

The Agency looks forward to continue working collaboratively with the Department as the Australian space sector rapidly changes.

Thank you again for providing an opportunity to comment and should you have any questions please reach out to Adam Clash, who can be contact on (02) 6102 9177 or [adam.clash@space.gov.au](mailto:adam.clash@space.gov.au).

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Karl Rodrigues".

Karl Rodrigues

A/g Deputy Head  
Australian Space Agency  
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