



44 Avenue Road
Mosman NSW
Australia 2088

T : 61 2 8968 7100
F : 61 2 9969 3520
W : freetv.com.au

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

Dear Sir/Madam

Re: Review of the 2.5 GHz band and long-term arrangements for ENG – Designation proposal

Free TV Australia welcomes the opportunity to comment on the ACMA's *Review of the 2.5 GHz band and long-term arrangements for ENG – Designation proposal*.

This letter outlines some observations that Free TV member organisations, Seven Network, Nine Entertainment and Network TEN have made in relation to this proposal as the ACMA moves to investigate the technical and regulatory issues associated with the conversion of licences in the 2.5GHz band.

Free TV members welcome the ACMA's following statements in the Designation proposal in relation to long term arrangements for ENG:

A range of other bands will be made available for ENG to enable provision of ENG service delivery that is equivalent to that currently provided.

The new spectrum licences must, so far as is practicable, authorise the operation of radiocommunications devices to the same extent as, or to a greater extent than, the apparatus licences they replace. This process is referred to as 'conversion'.

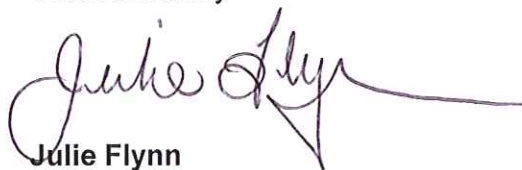
Free TV notes that all TOBN licensees in the existing 2.5GHz channel plan are affected by this proposal based on the current correspondence the ACMA has had with the licensees.

Free TV members note that the future utility of the mid band gap for ENG will rely on the guard band requirements which ACMA has estimated in ACMA media release 7/2010 – 12 January between 5-10MHz. Accordingly we would require clarification that given the guard band requirements, all TOBN licensees will be treated equally in the process of conversion to spectrum licensing.

Free TV members look forward to developing the matters indicated above further in the ACMA Technical Liaison Groups.

Thank you once again for the opportunity to comment on the *Review of the 2.5 GHz band and long-term arrangements for ENG – Designation proposal*.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Julie Flynn', with a long horizontal flourish extending to the right.

Julie Flynn
CEO