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WBT Inquiry
Submission No.40.....

**Network Consultants' submission to the
Inquiry into Wireless Broadband Technologies**

**The Secretary
House of Representatives
Standing Committee on Communications, Information Technology and the Arts
Parliament of Australia**

24 June 2002

Dear Sir/Madam:

Thank you for giving us the opportunity to make a submission to this inquiry.

Network Consultants is a telecommunications consulting firm based in Germany, providing a wide range of planning, engineering and consulting services to operators, system suppliers and regulators of wireless communication networks. Being involved in projects on all 6 continents, we have accompanied the development of mobile communications and the Internet through their explosive growth phases in the past decade and would like to share with the committee our views on regulation and licencing of wireless broadband services, in particular with regard to technologies operating in class-licenced spectrum, like the 802.11 family of standards.

WIRELESS Internet access is seen by many – governments, industry and user groups, educational facilities – as the next "revolution" that will change the way we live, work, play and learn – possibly more so than the immense growth of usage of the Internet itself (through wires) and mobile telephones in the past decade.

Revolutionary developments like these have required and continue to require fundamental redirection of thinking and legislation. Even though we may hardly remember it today, the licencing of additional mobile telephone network operators to compete with the traditional, often government-owned telcos, even though still in a quite firmly regulated environment, is an early example for such fundamental change. The Internet, on the other hand, has probably only been able to change our lives to the extent it has because it is largely unregulated.

This balance between regulation and free enterprise will be hard if not impossible to meet to the full satisfaction of all parties involved, also with regards to wireless broadband access. The primary concern should however always be for the consumer who is looking for a wide choice of affordable services, and for creating new business opportunities, also and particularly for small enterprises, especially in these economically difficult times we are currently going through worldwide.

It is widely known that in the United States no restrictions and licencing requirements exist with regards to commercial operation of 802.11 wireless LANs, including wireless Internet service provision to the public. Not so widely known is the fact that this is also the case in many European countries (e.g. Austria, Switzerland) and elsewhere in the world. It has not come to our knowledge that the users of other low power devices in the same frequency bands (garage door openers etc.) have been adversely affected by this in these countries.

In many other countries where restrictions still exist, the use of wireless broadband technologies in class-licenced spectrum is currently being reviewed by the relevant authorities like it currently is in Australia. As a recent example for far-reaching legislative changes in this matter, Great Britain can be quoted: Less than 2 weeks ago, the government there decided to open up the class-licenced 2.4 GHz spectrum to commercial operation of Wireless LANs (e.g. 802.11), including the provision of wireless Internet access to the public, and to significantly reduce or even eliminate completely the licencing barriers for this. Despite the fact that Great Britain certainly represents a telecommunications market with extensive very high density areas, the government is explicitly accepting that commercial operators will have to take into account possible interference and security issues but gives priority to the benefits of giving *"the resources to businesses to create and deliver such services to benefit the public, to make the best use of spectrum, and make sure they can continue to compete in a global market place"*.

We would encourage the Australian government to adopt a similarly liberal regulatory policy.

At the same time however, we would like to point out that the benefits of such a liberalised regulatory framework can only be achieved if on the other hand a certain degree of regulatory pressure is applied to the WIRELINE high speed Internet service providers (DSL, Cable – and also Satellite) which new wireless access network operators will depend on for their backhaul. Interconnection must be unrestricted, reduced wholesale prices for wireline or satellite broadband capacity must be available to wireless access providers and all restrictions with regards to reselling, redistributing or third-party-sharing that are currently manifested in the terms and conditions of many of these companies must be abolished. We feel that this crucial point has not received enough attention yet in the submissions to this inquiry to date.


Thank you again for giving us the opportunity to share our views, we wish the Australian government every success for the upcoming decisions in this matter in order to serve the Australian people in the best way possible.

Yours sincerely,



Peter Lange

Director – Network Consultants



Steve Walker
24/6/02