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Proposed exemption to facilitate Australian Federal Police (AFP) use of drone jamming devices

– ITS Australia Submission on the ACMA Consultation Paper

ITS Australia is the peak group representing over 120 public and private organisations delivering on transport solutions and technology improving Australia's road and transport networks and promotes the development and deployment of advanced transport technologies.

We appreciate the opportunity to engage with the Australian Communications and Media Authority (ACMA) regarding the proposal for an exemption to the Australian Federal Police (AFP) to address their concerns regarding the potential challenges increasing amounts of drones and similar unmanned devices pose to our communities and national security.

For many years ITS Australia engaged with government and industry on the then proposed regulatory arrangements to support the introduction of cooperative intelligent transport systems (C-ITS) in the 5.9 GHz band (5.855–5.925 GHz) in Australia. This was to enable the much-needed vehicle safety services that C-ITS can offer.

With more than 1,200 people dying and over 30,000 people being seriously injured each year on Australia's roads, the only long-term goal we can have is for zero fatal and serious injuries. To that end, we believe we will only work towards that vital and ambitious goal through transport technologies, including C-ITS and automated vehicle technology. We believe the ACMA allocation of Radiocommunications (ITS) Class Licence 2017 is a key component of this undertaking.

There's much discussion these days about once-in-a-generation change; digital disruption, major demographic and societal shifts, and mega-projects offering improvements unimagined by our grandparents or sometimes even parents. What has not been seen before though is the kind of unprecedented potential for change in transport we are currently experiencing.

These changes while extremely positive and exciting for the most part also bring with them concurrent challenges and risks. Security and safety threats to our communities and critical infrastructure are serious concerns that need to be given critical consideration and balanced against the potential benefits these technologies offer.

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Conclusion

ITS Australia commends the ACMA in working with the AFP and in engaging with industry and the wider community on the potential impacts of their request for an exemption and access to spectrum for use of drone jamming devices.

We broadly support any efforts to improve security for our communities and critical infrastructure such as the proposed exemption for the Australian Federal Police to operate drone jamming devices in the 2.4GHz and 5.8GHz to disable potential drone attacks in Australia.

We are however mindful that given the adjacency to the ITS Class License Band at 5.9GHz, there is a potential to negatively impact V2V/V2I Communications.

We are also conscious of the fact that our toll-road operators manage their extensive networks across Australia on 5.8GHz and with that specific frequency being proposed for use by the AFP and its close adjacency to 5.9GHz we would invite further investigation into any unintended consequences.

We would also suggest that to minimise any impact on vehicle C-ITS systems operation of a drone jamming device while testing, training of operators, or maintenance be undertaken in an environment away from traffic areas. We understand that blocking of drone communication can be reasonably selective in how it is implemented, ie. Not "broadcast" but "directional" in implementation, and selective scanning, which we appreciate also being considered going forward.

Our recommendation would also be for any drone jamming device authorised for use under this exemption be assessed by the AFP in consultation with industry for interference potential to vehicle C-ITS safety systems. As a vehicle safety service operating under the ITS Class Licence in the 5.9 GHz band we strongly suggest the equipment to be used be thoroughly tested and parameters be set in order to limit their out of band emissions.

In closing, we also support the ACMA proposal for the determination to expire after a two-year period and a subsequent review of the exemption and AFP operational requirements.

Once again we appreciate the opportunity to provide input on this important undertaking and would be pleased to engage with our members regarding any details in this submission where the ACMA would find benefit in more information on the more technical and industry specific implications of these proposed changes.

If you require any further information please do not hesitate to contact me on (03) 9646 6466 or email susan.harris@its-australia.com.au.

Yours sincerely,

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ITS Australia Background

ITS Australia is the peak group representing over 120 public and private organisations delivering on transport solutions and technology improving Australia's road and transport networks and promotes the development and deployment of advanced technologies to deliver safer, more efficient and sustainable transport across all public and private modes – air, sea, road and rail.

Established in 1992, ITS Australia is an independent not-for-profit incorporated membership organisation representing ITS suppliers, government authorities, academia and transport businesses and users. Affiliated with peak ITS organisations around the world, ITS Australia is a major contributor to the development of the industry.

As set out in the Strategic Plan 2018-2021 our vision is to shape future transport to be safe, efficient and environmentally sustainable through the implementation of Intelligent Transport Systems. Our mission is to:

- Advocate for, and inform discussion about, ITS;

- Facilitate collaboration and partnering amongst industry, government and researchers;

- Support research, development and the deployment of ITS technologies;

- Influence and guide the successful development of the ITS industry.