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Radio Spectrum Management
Ministry of Business, Innovation & Employment
PO Box 2847,
Wellington 6140

Subject: Public Consultation on Future Use of 24–30 GHz Spectrum

To whom it may concern,

Tactical Solutions welcomes the opportunity to provide this submission in response to the Radio Spectrum Management's (RSM) consultation on the future use of the 24-30 GHz spectrum.

As a leading provider of advanced security screening technologies for aviation and critical infrastructure sectors in New Zealand we recognise the essential role that radiocommunications policy plays in enabling robust and effective security measures. We wish to emphasise the critical importance of millimetre-wave (MMW) body scanner technology, which is fundamental to safeguarding people, assets, and operations across these high-risk environments.

The Role of Body Scanners in Aviation & Critical Infrastructure Protection

Body scanners play a crucial role in security screening operations, enhancing safety and risk management for high-security environments. While airports have benefited from the deployment of MMW body scanners globally, similar security concerns exist across a wide range of other critical infrastructure facilities, including:

- Correctional facilities.
- Data centres.
- Power plants and energy facilities.
- Government buildings and defence installations.
- Parliament buildings.
- Large-scale public events and stadiums.
- Corporate and commercial buildings with high-security requirements.

Enabling the use of MMW body scanners in New Zealand would greatly enhance national security capabilities.

The Need for Class Licensing Framework

To address these challenges and enhance security across New Zealand aviation and critical infrastructure sectors, Tactical Solution respectfully requests RSM to consider class licensing framework to allow for the operation of the millimetre wave body scanners into Airports and critical infrastructure environments. Class Licencing would:

- Enhance national security by providing high-risk facilities with the same level of security screening currently available at airports around the world.
- Maintain regulatory efficiency by providing clear operational parameters under a class licence, without the need for individual approvals.
- Align New Zealand security framework with international best practices, where millimetre wave body scanners are increasingly used in diverse security settings.

Next Generation of Body Scanners

The next generation of body scanners offers significant advancements in resolution, processing speed, and detection accuracy. Operating across an extended 20–40 GHz spectrum, these systems deliver superior performance for high-security environments. Tactical Solutions recommends that body scanners utilising this broader frequency range be incorporated into the class licensing framework.

International precedent supports this approach: the United States has maintained FCC approval for MMW body scanner scanners in the 20–40 GHz range since 2016, with similar approvals in Korea, Thailand, Singapore, Canada, Japan, Iceland, and the Dominican Republic. There are other suppliers of MMW scanners operating within the 10–40 GHz range that have received FCC approval, reinforcing global acceptance of this technology.

Safety & Emissions

MMW body scanners use non-ionising MMW technology to safely detect concealed threats. Unlike X-ray systems, MMW scanners do not penetrate the skin and pose no health risks to users.

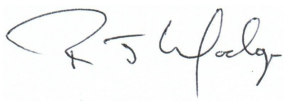
The electromagnetic emissions from MMW body scanners have an extremely low power output and does not penetrate the enclosure walls of the scanner. MMW systems are engineered to contain all emissions within the unit, ensuring safe and compliant operation in indoor environments. Due to their low output, MMW scanners do not cause harmful electromagnetic interference. Regulatory authorities, including the FCC, have confirmed that MMW scanners present minimal risk in controlled environments.

Independent testing by several certified radio laboratories on wide-band MMW consistently shows that the risk of interference is minimal. Tactical Solutions can provide the complete test report upon request.

Conclusion

Tactical Solutions respectfully requests that RSM consider granting a class license for wide band body scanners in the frequency range of 20-40 GHz.

Regards



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