

14/6/2020

Attention Chris Worley
Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Re : Submission on the possible use of the 5351.5-5366.5 kHz band by the amateur service.

Thank you for the opportunity to lodge a submission on this topic. I have been a radio enthusiast for over 50 years and strongly support amateur access to this spectrum segment.

A 60-metre band allocation would permit low power narrow band experimental communications over local and distant propagation paths that are not possible with the existing lower HF band allocations. This is especially important with the current very low levels of solar activity.

The 15W EIRP limitation for this band makes it particularly suited to mobile and portable stations with small low efficiency antennas and or low power transmitters.

I favour Option 2 as offered being the best arrangement for most users as proposed.

However, I wonder why Option 1 does not just restrict the use of the upper 1.5kHz of the segment in Queensland and NSW near existing services rather than the whole band in these regions. This would combine the best features of both Options 1 and 2 without impacting the primary users.

Radio amateurs already have experience with narrow allocations of the radio spectrum and access to radio spectrum on a secondary basis.

I am aware of some discussion regarding the licence level appropriate to this band. As a general principle I believe that for a service engaged in self-directed learning and experimentation that any barriers should be set at the minimum required standard. Given the power limits specified all licence classes would be appropriate.

However, there is limited commercial equipment suitable for use on this band without physical modifications and or firmware updates provided by the manufacturer of supported devices. So, access should then be limited to those at the Standard or Advanced licence levels.

Yours faithfully,

Andrew Russell, VK5CV

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