

## Sean McQueen

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**From:** Glenn Dunstan <president@vkradioamateurs.org>  
**Sent:** Wednesday, 28 October 2020 5:57 PM  
**To:** Sean McQueen  
**Cc:** RASA rasa; Nicholas Brody; Patrick Emery  
**Subject:** RE: Amateur Radio Licence [Ref: CSC2020-31962] CRM:001214011435 [SEC=OFFICIAL]

Hello Sean,

██████ has forwarded your email to the RASA committee. I have a couple of questions.

You say that ACMA formed the view that changing callsign when moving interstate is no longer a matter of operational policy. And yet, the callsign template is?

There is no difference between numeric prefix and the callsign template from a regulatory heads of powers perspective; as you say, they are both administrative, not regulatory.

So, why are you treating them differently? Your approach appears inconsistent.

We put it to Patrick that the general sector view was that the association between prefix and location should remain.

This is an issue that the sector feels strongly about – every amateur we talk to at ham fests or club meetings is against this change, and yet you choose to ignore sector views.

It is a requirement in the Deed that initial callsign issue should reflect location, and yet the requirement is waived if one moves location.

What's the point?

It is either a requirement or it isn't. The numeric prefix either consistently indicates location, or it doesn't.

You either consistently apply administrative policy, or you don't.

Indeed, why not just waive the template altogether?

Regards  
Glenn

Glenn Dunstan VK4DU  
President  
The Radio Amateur Society of Australia Inc.

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**BEING HEARD  
IS IMPORTANT**  
The Radio Amateur Society of Australia inc.  
[vkradioamateurs.org](http://vkradioamateurs.org)

----- Forwarded message -----

From: **Spectrum Licensing Policy** <[SpectrumLicensingPolicy@acma.gov.au](mailto:SpectrumLicensingPolicy@acma.gov.au)>

Date: Wed, Oct 28, 2020 at 1:16 PM

Subject: RE: Amateur Radio Licence [Ref: CSC2020-31962] CRM:001214011435 [SEC=OFFICIAL]

To: [REDACTED]

CC: Spectrum Licensing Policy <[SpectrumLicensingPolicy@acma.gov.au](mailto:SpectrumLicensingPolicy@acma.gov.au)>

Dear [REDACTED]

As indicated on the ACMA's [website](#), it was long-standing operational or administrative policy—which is distinct from ‘enforcement’ or regulation—that amateurs moving interstate had to get a new call sign. We formed the view that it should no longer be a matter of operational policy to get a new call sign when an amateur moves interstate.

Similarly, the reservation of call signs, and the structure of and process for, allocating amateur call signs, is generally not a regulatory requirement, but rather a matter of operational or administrative policy, supplemented by the Deed between the ACMA and AMC.

You have indicated you are “very confused as to what is regulation and administrative or operational policy.” The ACMA has published a fact sheet “Regulatory roles and responsibilities” to assist <https://www.acma.gov.au/sites/default/files/2020-05/Fact-sheet-Amateur-radio-Regulatory-roles-and-responsibilities.pdf> Relevantly, the fact sheet notes that: “*Non-regulatory administrative policy refers to the management of aspects of amateur radio that are not related directly to a statutory function, but which may be additional to functions performed by the ACMA or the AMC. Examples of administrative policy include aspects of call sign syntax...*”

If it assists, you could think of the previous practice of reserving certain call signs for advanced licensees as operational or administrative policy. There was no regulatory provision in the *Radiocommunications Act 1992* (the Act) or in a legislative instrument requiring the ACMA to issue advanced call signs to advanced licensees only. Rather, the setting aside of some call signs for advanced licensees, and the practice of not giving those call signs to standard and foundation licensees, was a matter of operational or administrative policy, given effect by the Deed between the ACMA and the AMC.

#### **Your request for a formal review**

It is unclear to me of which ACMA “decision” you are formally requesting there be a review i.e. my indication to you that we do not intend to instruct the AMC to recommend that the ACMA allocate to you a call sign reserved for the Girl Guides, or the reservation of the GGA-GGZ and SAA-SDZ call sign ranges for Scouts Australia and the Girl Guides.

In any event, Part 5.6 of the Act specifies ACMA decisions subject to internal reconsideration, and applications may be made to the AAT to review those decisions if the ACMA.

I note that call sign allocation and management operations are not specified as reviewable decisions under the Act, although it remains open to you to seek to have the relevant matter reviewed by a review body.

It is also open to you to seek to take this matter further within the ACMA, although I note that Mr Nicholas Brody (Manager Spectrum Licensing Policy) and Mr Patrick Emery (Manager Licence Allocation) have reviewed this response.

Sincerely

**Sean McQueen**

Senior Policy Advisor  
Spectrum Allocations Branch | Communications Infrastructure Division

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**Australian Communications and Media Authority**

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*The ACMA acknowledges the traditional custodians of this land on which we meet, work and live. We recognise and respect their continuing connection to the land, waters and communities. We pay our respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

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**From:** [REDACTED]

**Sent:** Monday, 26 October 2020 5:09 PM

**To:** Spectrum Licensing Policy <[SpectrumLicensingPolicy@acma.gov.au](mailto:SpectrumLicensingPolicy@acma.gov.au)>

**Subject:** Re: Amateur Radio Licence [Ref: CSC2020-31962] CRM:001214011435 [SEC=OFFICIAL]

Dear Mr McQueen

Thank you for your prompt reply.

Can you explain why in view of

"I would like to clarify that the management of call signs is largely a matter of administrative policy for the ACMA. Most decisions surrounding how call signs are allocated are, therefore, operational policy decisions for the ACMA, rather than regulatory decisions."

That ACMA decided it could not enforce the state prefix and the requirement not to change call signs if moving interstate, but is prepared to enforce the allocation of a block of call signs to an organisation?

There is a lack of logic and an inconsistency in all of this.

I am, and so are many others, very confused as to what is regulation and administrative or operational policy. Remember Amateurs have to pass an assessment in "Regulation" to hold a Standard or Advanced Licence. These strange decisions are making a mockery of due process. The call sign template wasn't broken, so apart from allowing all grades of Licences to have 3 letter suffixes, why did you tinker with it? The premise of "if it ain't broke, don't fix it" comes to mind!"

There is nothing in the laws relating to AR that restrict specific call signs to special groups, just as there isn't about changing a state prefix.

I formally request a review of the ACMA's decision and if necessary will take the matter further.

All AR wants is a regulator that regulates to the law in a consistent manner and doesn't just decide on matters for administrative reasons and a powerful lobby.

With kind regards

[REDACTED]

On 26 Oct 2020, at 1:47 pm, Spectrum Licensing Policy  
<[SpectrumLicensingPolicy@acma.gov.au](mailto:SpectrumLicensingPolicy@acma.gov.au)> wrote:

Dear [REDACTED]

Thank you for your email.

The AMC has provided you with the correct information and advice.

The ACMA recently made some administrative changes to how call signs are allocated to amateur radio licensees. We published information about those changes here <https://www.acma.gov.au/changes-amateur-radio-call-sign-policy> and the AMC also made changes to the amateur call sign template and to its operations.

Subsequent to the publication of the revised call sign template, and following consideration of the historical reservation of the GGA-GGZ and SAA-SDZ callsign ranges, we instructed AMC to amend the call sign template to reinstate the previous reservation for allocation of those ranges. I expect those changes to be made soon, and it is appropriate that the AMC is currently applying this policy in the meantime.

In relation to your commentary about regulation of call signs and enforcement, I would like to clarify that the management of call signs is largely a matter of administrative policy for the ACMA. Most decisions surrounding how call signs are allocated are, therefore, operational policy decisions for the ACMA, rather than regulatory decisions.

In relation to call signs reserved for Scouts and Girl Guides, we are not aware of substantial demand for these call signs outside of the Scouts or the Girl Guides, and we note that there is no shortage of otherwise available call signs for amateur licensees.

In relation to your specific request, we do not intend to instruct the AMC to recommend that the ACMA allocate the call sign VK6GGG to you.

I can confirm that, at this time, we are not contemplating allocating blocks of call signs to other organisations or specific types of licensees.

Sincerely

**Sean McQueen**  
Senior Policy Advisor  
Spectrum Allocations Branch | Communications Infrastructure Division

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----- Original Message -----

**From:** [REDACTED]  
**Received:** Wed Oct 21 2020 19:44:59 GMT+1100 (AUS Eastern Summer Time)  
**To:** ACMA Customer Service Centre; Mail Delivery System; System Contact  
**Subject:** Amateur Radio Licence

Dear Sir/Madam

In September I applied to the AMC for the AR advanced call sign VK6GGG

I was informed that at that time this could not be allocated to me

I communicated again with the AMC today and have been informed that there remains an issue as this call sign is "allocated" to the Girl Guide movement.

How can this be? I understood that the amateur call sign template had been deregulated and that such block allocations were now a thing of the past.

If it is indeed true that there are to be "protected" blocks for Scouts and Guides what is to prevent such blocks being protected by other groups, organisations or clubs. Scouts and Guides are no different to any one else.

If organisations want a call sign then they need to obtain a recommendation and be issued the licence, just as I as an individual am required to do. If ACMA decides to waive the fee/tax then that is between the ACMA and the organisations concerned.

If the ACMA intends to be a proper regulator then there has to be a level playing field. A failure to do so will result in chaos and certainly won't assist the ACMA in gaining the sector agreement that it has widely touted.

The call sign template wasn't broken before the ACMA decided that the majority of call sign regulations were in fact not regulations, ie legally enforceable. The allocation of G and S call signs to Scouts and Guides is as unenforceable as the requirement to change state designators when an amateur moves interstate.

ACMA need to resist a lobby from a powerful group and act as a consistent regulator. A failure to do so will result, no doubt, in a legal challenge.

Please instruct the AMC to recommend the call sign VK6GGG to me and confirm that allocation of blocks of call signs to organisations will not occur.

Regards

[REDACTED]

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