

Sean McQueen

From: Stewart White
Sent: Friday, 19 June 2020 9:45 AM
To: Patrick Emery; Mary Stavropoulos
Cc: Matthew Bye; Sean McQueen; Nicholas Brody
Subject: RE: REVISED AMATEUR CALLSIGN STRUCTURE [SEC=OFFICIAL]

Hi Patrick

Support the 2 x 1 callsign and 'class agnostic' approach. However, I thought the recent change to the call sign structure was to support a call sign for life approach. If that was the intent, then I believe having a state identifier may defeat this approach should those who move interstate decide to change their state identifier, i.e. it is highly likely that they will not be given the same suffix for the new state (does that make sense?). Removing the state identifier will provide a true call sign for life approach. For me, it depends on what outcome we are trying to put in place – If it is a call sign for life, then the state identifier is not required. If it's not, then we could keep the state identifier and as you say – only change it if supported by the amateur community.

As Mary said as an extension to my original point on this, we could put these ideas in our upcoming consultation paper. The reason – relying on the WIA and RASA to provide a consensus view has, to date, caused us much anxiety, also they only represent a 1/3 of the Amateur community. The ITU allocates call sign series to each country (our is within the range of AXA-AXZ), as we are a signatory to the Radio Regulations do we have some responsibility for the management of the call sign structure here in Australia?

Cheers

Stewart

From: Patrick Emery <Patrick.Emery@acma.gov.au>
Sent: Thursday, 18 June 2020 4:31 PM
To: Mary Stavropoulos <Mary.Stavropoulos@acma.gov.au>
Cc: Matthew Bye <Matthew.Bye@acma.gov.au>; Sean McQueen <Sean.McQueen@acma.gov.au>; Nicholas Brody <Nicholas.Brody@acma.gov.au>; Stewart White <Stewart.White@acma.gov.au>
Subject: RE: REVISED AMATEUR CALLSIGN STRUCTURE [SEC=OFFICIAL]

Thanks everyone. I've just had a closer look at what's being proposed. I do not have any concerns with the 2 x 1 callsign issue, nor the freeing up of the callsign template to remove the link to licence 'class'.

On the geographic identifier element, I have some residual concerns, not so much because of any substantive objection to the overall outcome (ie. 'freeing up' the callsign template), but because I am concerned some advice we provided on a specific issue is being used as the basis for a more radical change. The nature of this change is likely to generate concern within the amateur community.

The specific advice I provided to Glenn Dunstan (in his role as AMC advisor) earlier this year was in relation to the 'requirement' that amateurs must obtain a new callsign if they move interstate. The advice I provided was that there is no regulatory requirement for such a move. This remains correct; however, it has been the ACMA/ACA/SMA's long-standing operational practice to require amateurs moving interstate to obtain a new callsign. While it may be inferred from that advice that we supported removing the geographic link altogether (ie. for any new applicant), that was not expressly considered when I provided the advice to the AMC.

While I believe the ACMA should be agnostic about the matter – it is not intrinsic to spectrum management – I am concerned that a wholesale change by the AMC to the callsign template such that there is no geographical identifier at all for future callsign allocation, will generate concern amongst the amateur community. This is an behavioural

practice matter that I would expect the amateur community to discuss and resolve itself (as apparently has happened in the past in the US).

So, my inclination is to go back to Martin and to (1) say that we support the 2 x 1 callsign and 'class agnostic' aspects of the proposed new template, (2) clarify the advice that was provided previously in relation to geographic identifiers, and (3) observe that removing the geographic link altogether for new applicants may be of interest and potential concern to the amateur community. We would only agree to such a change if it is supported by the amateur community.

Thoughts?

Cheers

Patrick

From: Mary Stavropoulos <Mary.Stavropoulos@acma.gov.au>

Sent: Tuesday, 16 June 2020 4:11 PM

To: Patrick Emery <Patrick.Emery@acma.gov.au>

Cc: Matthew Bye <Matthew.Bye@acma.gov.au>; Sean McQueen <Sean.McQueen@acma.gov.au>; Nicholas Brody <Nicholas.Brody@acma.gov.au>; Stewart White <Stewart.White@acma.gov.au>

Subject: RE: REVISED AMATEUR CALLSIGN STRUCTURE [SEC=OFFICIAL]

Hi Patrick

Martin's proposal will simplify the call sign arrangements, which is consistent with our approach to simplify amateur arrangements more broadly. I believe there would be considerable amateur interest in any changes that remove the distinction between amateurs, whether it's a location identifier for a call sign or privileges associated with their qualification level. While the call sign template changes is not a matter that is directly under our regulatory remit, we will probably receive complaints from amateurs who are not aligned with WIA or RASA.

At the very least, we have the option of updating amateurs through our new communications strategy, website, ebulletin etc.

[REDACTED]

Regards,
Mary

From: Nicholas Brody <Nicholas.Brody@acma.gov.au>

Sent: Tuesday, 16 June 2020 1:01 PM

To: Patrick Emery <Patrick.Emery@acma.gov.au>; Stewart White <Stewart.White@acma.gov.au>

Cc: Mary Stavropoulos <Mary.Stavropoulos@acma.gov.au>; Matthew Bye <Matthew.Bye@acma.gov.au>; Sean McQueen <Sean.McQueen@acma.gov.au>

Subject: RE: REVISED AMATEUR CALLSIGN STRUCTURE [SEC=OFFICIAL]

Hi Patrick,

I have no problem with Martin's proposals, and indeed I consider them in line with our general policy disposition on amateur issues outside of our regulatory remit.

I'm not sure I think further amateur consultation is warranted on this matter, noting that both WIA and RASA have undertaken their own consultation on the foundation callsign matter. Happy to discuss further though if you disagree.

Cheers,

Nicholas Brody
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Spectrum Licensing Policy

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I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respect to Elders past and present and to all Aboriginal and Torres Strait Islanders.

From: Patrick Emery <Patrick.Emery@acma.gov.au>
Sent: Tuesday, 16 June 2020 9:29 AM
To: Nicholas Brody <Nicholas.Brody@acma.gov.au>; Stewart White <Stewart.White@acma.gov.au>
Cc: Mary Stavropoulos <Mary.Stavropoulos@acma.gov.au>; Matthew Bye <Matthew.Bye@acma.gov.au>
Subject: FW: REVISED AMATEUR CALLSIGN STRUCTURE [SEC=OFFICIAL]

Hi people,

Any initial thoughts on Martin's email proposal? In particular, do we see the risk of objection from other parts of the amateur community? It might be worth considering how we approach the request in light of our recent public-facing communication. For example, should we consult more widely with the amateur community? I'm open to any views on the matter.

Regards,

Patrick

From: Martin Crees-Morris <[REDACTED]>
Sent: Tuesday, 16 June 2020 8:58 AM
To: Patrick Emery <Patrick.Emery@acma.gov.au>
Cc: [REDACTED]
Subject: REVISED AMATEUR CALLSIGN STRUCTURE

Dear Patrick,

REVISED AMATEUR CALLSIGN STRUCTURE

Having consulted with our expert advisers I write with reference to the correspondence from Nic Brody regarding proposed changes to the amateur callsign template.

As we understand it, you are proposing to remove the connection between callsign suffix and licence class for all three-letter suffix callsigns. That is, any grade of licence may have any three-letter suffix. Four letter suffix Fxxx callsigns, currently used for Foundation class amateurs, will no longer be issued.

Two letter suffixes will remain exclusive to Advanced class amateurs.

We also understand that any amateur permanently moving to a new State/Territory is no longer required to change their callsign to reflect their new location. That is, if a Sydney VK2 (NSW) station moves to Adelaide (VK5 - SA), they can retain their VK2 callsign.

This has effectively removed the connection between location and numeric prefix – of course, it has also reduced AMC revenue, as amateurs will not apply for a new callsign when moving interstate.

A new callsign template

Changing the callsign structure will impose extra administrative overhead on our operation. Accordingly, we wish to take the opportunity to streamline the callsign template to provide maximum flexibility for users, ourselves and ACMA.

To the end, we propose the following:

Group VK1-8 together

The decision to remove the numeric prefix connection to location to be reflected in the new proposed template, with the exception of VK0 (Antarctica) and VK9 (external territories).

Both VK0 and 9 are known as “separate countries” in amateur radio parlance for award purposes. The mainland and Tasmania (VK1-8) can be grouped together – i.e. any location on the mainland and Tasmania may use any numeric prefix.

It is proposed that VK0 and 9 will still require an address to match the callsign.

Free up the template

Any class of licence is now eligible for any three letter callsign. It is logical to extend this philosophy to the entire template – that is, any three-letter block is available to any licence class, apart from repeaters and beacons, which will retain the Rxx series.

Grouping 1-8 together, along with allowing any three-letter prefix for any licence grade will simplify processes considerably.

No new Fxxx callsigns will be issued, however, it is proposed that holders of existing callsigns with Fxxx suffixes may retain their callsigns.

Free up 2 x 1 callsigns

The other area of simplification is in the composition of 2 x 1 callsigns. The allocation of 2 x 1 callsigns for contest stations was discussed and approved some time ago, however we have not progressed this because of administrative overhead.

The criteria for allocation of these callsigns was quite difficult, as it was always assumed that they were a limited resource (i.e. VKnA only) and the allocation process had to be equitable. Of course, this difficulty translated to complex administrative processing for AMC staff.

It is proposed to extend the 2 x 1 template by expanding it to the VJ, VK and VL prefixes, with the only criteria being that the callsigns be available to advanced stations, for use in contests and be limited to one callsign per licensee (club or individual).

The advantages of this are:

- the pool of available 2 x 1 callsigns is greatly increased, thereby allowing the callsigns to be used by many more amateurs, including newcomers (via a club station); and
- no extra complexity or processing for AMC staff – the callsign is treated like a 2 letter suffix callsign.

No changes are proposed to special event callsigns, or the AX prefix allocation rules.

The proposed templates (from Appendix 2 of the deed) are in the annexures attached below

Yours sincerely,

Martin Crees-Morris

ANNEX A – PROPOSED CALLSIGN TEMPLATES

(refer Appendix ii of the deed)

Table 1 - Amateur callsign construction

Prefix	Suffix
*VJ\$,VK\$,*VL\$ where \$ is the State/Territory Indicator. This is a number from 0-9 indicating the location in which the station is operating: 0 = Antarctica 1- 8 = ACT, NSW, Victoria, Queensland, South Australia, Western Australia, Tasmania, Northern Territory 9 = Australian External Territories	Suffix of one, two or three letters. See Table 2 for template details.

Note:

*See table 2 for use of these prefixes

Table 2 - Callsign templates allocated to the amateur licensing options

Licence Option	Template
Advanced	VK\$aa, *VJ\$a, *VK\$a, *VL\$a
Advanced Standard Foundation	VK\$aaa-VK\$zzz
Repeater Beacon	VK\$Raa-VK\$Rzz

Note:

*These callsigns are to be used for contest operation only and are limited to one per licensee (individual or club).

Martin Crees-Morris
Business Development – Engineering
Lecturer - MLM
Manager – OMC + Amateur Radio





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University of Tasmania Electronic Communications Policy (December, 2014).

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