

26th March, 2021

UNCLAS

The Manager
Technical Regulation & Carrier Infrastructure Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

Robert Campiciano
[REDACTED]
[REDACTED]

In response to the consultation to the "Radiocommunications equipment rules Consultation paper"

The ACMA intent is clear in that to limit devices that could cause harm to legitimate services in one form or other, in doing so it casts a wide net that in fact causes limitations to the Amateur Radio Service.

From its inception the Amateur Radio Service under several administrations dating back to the 1920 has enjoyed an equipment freedom only limited by the legislative requirement of operation without causing interference to other services.

In the history of the Amateur Radio Service this general principle has worked very well, demonstrating the maturity of those given the privilege to operate under the Amateur Radio Certificate of Proficiency.

Some time ago the ACMA or its predecessor (There has been many) the Radio Amateur Licence moved from an operator to an equipment licence, presently known as unassigned apparatus licence.

The definition of the word apparatus in the Oxford Dictionary "(sic) the technical equipment or machinery needed for a particular activity or purpose."

Since a Radio amateur during the course of his activities will use several pieces of equipment the definition apparatus is a bit of nonsense but more of a clerical definition to bring amateur Radio licences in line with the rest of the type of licences issued by the ACMA.

In fact a choice of convenience for the ACMA and no other purpose to the Amateur Radio Service.

The Amateur Radio Service and associated equipment must be excluded from any of the intended controls that are implied in the proposed Class Licence consultation or the proposed amendments to the present Class licence act definition along with Radiocommunications equipment rules.

The ACMA should consider a separate Article with in the ACT to clearly define the Amateur Radio Service, retaining all of the protections offered by past legislations, recognising that the freedom provided returns the Australian community with incalculable benefits in many forms, be it social as well as commercial.

The ACMA should change the definition of the licence from an Apparatus to an Operator, then all of this confusion will end once and for all providing true transparency to the ACMA reform processes.

Presently all of the consultations offered under this reform process appear to me to be so designed to overwhelm the reader along with the intent to confuse.

The lack of precise details referring to parts of other legislation is more evidence of the intent.

Concluding

a) Redefine the Radio Amateur Licence back to what it once was that of an Operator

b) Exempt equipment used by Radio Amateurs from any legislative controls like it once was.

Not doing so is evidentiary of the intent to further reduce the privileges of the Amateur Radio Service.

Robert Campiciano
[REDACTED]