



To: The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Law Courts, Melbourne VIC 8010

Re: Review of non-assigned amateur and outpost regulatory arrangements – consultation 01/2021

Dear Spectrum Licensing Policy Section Manager

Thank you for the opportunity to comment on the Review of Non-assigned Amateur and Outpost Regulatory Arrangements – Consultation 01/2021. The Amateur Radio Experimenters Group (AREG), representing 90 amateur operators across 4 states, provides the following responses to the consultation paper:

AREG has considered the following options under review:

- **Option A:** keep the existing apparatus licensing arrangements and licence conditions.
- **Option B:** simplify the current licensing arrangements and licence conditions by amending the amateur LCD.
- **Option C:** transition to class licensing arrangements for non-assigned amateur stations, with assigned amateur stations continuing to be authorised under apparatus licensing.

AREG has concerns that the ACMA's stated purpose of "preserving the current operational utility for licensees" has not been reflected into the proposed Class Licence and that amateur radio operators will be disadvantaged in the future by moving to the Class Licence as currently proposed. Therefore:

AREG can only support Option A. At this time. AREG does not support Options B or C as presented.

If the ACMA is prepared to modify the proposed Class Licence to address the concerns identified in the WIA submission, then AREG's membership may be prepared to support a class licence for amateur radio in future.

In regards to the other issues and questions raised, the AREG, as a WIA affiliated amateur radio club, commends to ACMA for consideration the WIA's response to the ACMA Review Consultation and supports all the recommendations presented by the WIA in their paper.

Yours sincerely

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2nd April 2021