

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. We represent the Canberra Region Amateur Radio Club (CRARC). CRARC has 150 financial licensed radio amateurs as members. These members come from Canberra and the surrounding regions:

The Amateur Radio Service is more than just a hobby, it provides an important springboard for many people to gain a worthwhile career in the radio and electronics industry. The value to the Australian economy of Amateur Radio is immense. The Canberra Region Amateur Radio Club (CRARC) is a strong and vibrant club that provides an accessible and friendly path into Amateur Radio for people in the ACT and surrounding regions.

CRARC has a strong education focus and in so doing provides the inspiration for young minds as well as providing an avenue for continuing education of older members and the overall growth of the industry.

Our club provides the opportunity for operator skills development in the provision of radio communications for community events throughout the year. This capacity also has the potential for the ability to provide emergency communications in the event of a disaster. The club provides technical assistance to members and has regular meetings providing further opportunities for education on a variety of technical subjects.

The club has the technical expertise to setup, install and maintain repeaters and beacons on commercial transmitting sites.

The club has a depth of technical talent that is also capable of resolving low level interference issues that may occur within the amateur community.

We have 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.

We have 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:

We only support Option A. We do not support Options B or C as presented.

Some other concerns are that if a third party organisation is used to administer aspects of Amateur radio, such an organisation needs to have the capacity to deal with its function and raised issues in a timely manner. In recent history this has not been the case.

The treatment of interference is also a serious issue, both caused by and experienced by radio amateurs. Unauthorised incursions into amateur bands, particularly those designated as a primary service are troubling. The club does have capacity to deal with low level interference problems and would be willing to work towards resolving interference issues. When interference problems cannot be resolved at a low level there should be the means to be able to escalate the problem to ACMA.

With respect to the ACMA Register of Radiocommunication Licences. For radio amateurs there should still be a national and publicly available register recording the details of every licensed amateur. Without this there may be a proliferation of unlicensed operation. If such a register cannot be done through ACMA then it could be through a third party organisation.

Any third party organisation involved in the administration of amateur radio should also be able to escalate any problems back to ACMA and operate in a timely and efficient manner.

If the ACMA is prepared to modify the proposed Class Licence to address these concerns and those identified in the WIA submission, then we may be prepared to support a class licence for amateur radio in future.

In regards to the other issues and questions raised, We have read the WIA's response to the ACMA Review Consultation and I support all the responses and recommendations presented by the WIA in their response.

Yours sincerely

Fergus McCowan VK1FM
Secretary CRARC on behalf of
CRARC Committee
committee@crarc.org.au
2 April 2021.