

Proposed changes to amateur licensing arrangements

Non-assigned amateur stations

Comments by

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Thank you for the opportunity to comment on your proposed changes to Amateur Radio licencing arrangements.

Under the current Australian licencing system, which you rightly suggest requires updating and considerable improvement, I see the following situation:

Foundation Licence. MINIMAL assessment of theory - bare basics – yet thanks to the latest LCD update in 2019, such operators, even primary school aged children are now permitted to build test and operate their own home-brewed radio transceivers. Conceivably these operators have NO THEORY on the very circuitry of the kits they assemble, be that with the help of following numbered diagrams, and perhaps with the help of an on-line video via YouTube. The limited transmitter power and access to bands are ACMA applied restrictions for the ONLY apparent reason to separate them from the next level.

Standard Licence. This comes with a much deeper level of assessed theory plus the Regulations exam. These operators can still build test and operate their own equipment – just the same as Foundation but with higher transmitter power levels and access to a couple more RF bands... But again, there are RESTRICTIONS imposed by the ACMA. These operators have passed a theory and Regulations assessment, yet there are applied restrictions that can only be for the so-called rank privileges over Foundation level as they have no impact on the safe operation of a radio.

Advanced Licence. These amateur radio operators are assessed at an even higher technical level than the two lower levels of licence, yet hold absolutely NO advantage with respect to the legal right to build, test and operate their own equipment. This is the one area, which most experienced and professionally trained radio operators will acknowledge, presents the greatest risk to issues of interference. While the Advanced licence brings with it access to higher transmitter power, even those power levels, are small compared to allowable power levels for Amateur Radio operators in the US and many European countries- all of which are part of the IARU.

In Spain for example all Amateur Radio operators now have access to the recognised Amateur Radio HF 3 to 30 MHz band – and may operate using from 200watts to 1000watts – REGARDLESS of experience level and technical knowledge. One size fits all.

<https://www.fediea.org/hamradio/inspain/qrg.php>

So – having presented my view of the status quo, let me open my comments with the following.

Firstly – I welcome your desire to remove many of the current limitations and restrictions that are legislatively imposed on Australian amateur radio operators. However, I do not believe you have identified the single biggest anomaly in the current licencing system, and that is the complete lack of logic behind the band allocations (especially within HF) between the Foundation, Standard and Advanced licences. The confusion and lack of logic is now even greater following the changes to the LCD in 2019.

You state that the aims of the changes are to:

- > **remove unnecessary restrictions**, reduce costs on amateur licensees **and ensure continued access to spectrum, using the least cost and least restrictive approach** to meet our regulatory role
- > **simplify** the amateur licensing regime and **allow all amateur users greater flexibility** in using frequency bands, emission modes and equipment, in order to **promote both certainty and flexibility**
- > **maintain the existing licence conditions for amateur stations that are necessary to ensure interference management adequately balances the cost of interference, while allowing amateur licensees to better utilise available frequency bands.**

So, in keeping with your wishes to: ***remove unnecessary restrictions; allow ALL amateur users greater flexibility; allowing amateur licensees to better utilise available frequency bands;*** I am disappointed that you have not made all frequency bands (for non-assigned Amateur Radio) available to all “Classes” of licence, Foundation, Standard and Advanced. To ***maintain existing licence conditions***, I assume you refer to the LCD of 2019.

Given the changes to the LCD in 2019, whereby Foundation licensees, who with no technical knowledge assessment needed for the issue of their licence, are permitted to build test and operate their own ‘home brew’ radios, to what purpose do the extant band restrictions **reduce any risk of interference?** Why is there some perceived increased risk should a Standard Licence holder operating on 40m then operate on 30m or 17m? The procedures and regulations are identical for ALL grades of licence – Foundation to Advanced. It simply makes no sense. There is NO logic behind this existing restrictions. None. Other member nations of the IARU have a much simpler, one- level of licence with no such frequency band restrictions and are permitted to operate at much higher power levels than permitted here in Australia.

If the ACMA is serious about removing UNNECESSARY restrictions and continued access to spectrum using a LEAST cost and LEAST RESTRICTIVE approach-, then I urge you to look at those other countries which are successfully managing their amateur radio community without any obvious ‘interference management’ issues... Cheaper, with minimal restrictions, and easy to administer with just ONE level of licence.

An alternate approach and much easier to administer and police would be to reduce the current three tiers or “classes” to just TWO. Foundation - with the existing restrictions of power and band allocations, and, for want of another name, an ‘Open’ Licence combining the extant Standard and Advanced licences. As I have already suggested, there would be no adverse impact on “interference management” by granting Standard licence holders access to those bands currently enjoyed by Advanced licence holders. Indeed, I would go so far as to say all Amateur Radio operators could safely operate across all legislated internationally recognised Amateur bands.

The need for technical knowledge. It has long been the requirement for Operators to demonstrate (though supervised assessment) a working knowledge of electronic and radio theory. The reason, presumably, was to ensure people could safely experiment with building, testing and operating their own radio equipment without harming themselves or others or creating unwanted RF interference. However, with the 2019 amendment to the LCD that all went out the door. I argue that the higher level of theory and technical knowledge currently required to hold the Standard, then Advanced licence in NO WAY impacts on the safe operation of a radio on any RF band... Indeed, that higher level of theory in NO WAY makes one a more competent **operator**. The only risk of interference is brought about by permitting Foundation licence holders free range to build, test and operate their own home-built radio equipment

It is now possible and for those with ZERO experience as a radio operator to sit the Advanced theory exam and be given open slather... Yet there are many Foundation licence holders who are much more proficient as radio operators and have no desire to build their own radios. For example the many former ADF specialist radio operators who within the ADF did NOT require the level of theory demanded under the current ACMA controlled Amateur syllabus and licence issuing system... It is the knowledge and application of PRECEDURES and REGULATIONS that determine how well one communicates.

The technical knowledge is perhaps advantageous to those building testing and operating their own home-built transmitters and receivers, but the recent changes to the LCD permit a 9-year-old Foundation licence holder to do just that ... So again, I question the need for these unnecessary restrictions on band allocation and power. If the theory is NOT required (under the LCD) for the build test and operation of a radio transmitter, then why have that theory a requirement to operate on another HF bands or to progress to Standard and Advanced? The regulations and operating procedures are identical whether a day one operator with a Foundation Licence aged 9, or as 50-year-old long term amateur radio operator. There is no specialist theory required to change operating frequency and or mode of operation.

In summary, the new Class Licence 2021, though apparently unpopular with many of the long-standing amateur radio operators who resist change, is, I believe, a refreshing and welcome initiative,— BUT, it can only address the issues you seek to remediate if the current illogical restrictions on access to various HF bands and other Amateur bands are removed. If you choose to retain those inexplicable restrictions/limitations, then I see little benefit of the change to the Class Licence system you propose.

I believe by not making changes to allocated frequencies based on the current three tiers of licence, you are not removing those “unnecessary restrictions” which it would seem is one of your primary aims. There is absolutely no justification for the extant restrictions, although to satisfy those who prefer and argue for a tiered licencing system, I would be happy to see the retention of existing power restrictions. As a Standard licence holder, I can see no need whatsoever to go above my existing power restrictions. 100 watts PEP for SSB and 30 watts (mean) for CW is more than enough power for HF DX communications. Even if I had access to 400watts or even 1000watts, I would never go to that level – especially living in a well populated suburb.

I hope the proposal has been developed with the **genuine interests of the Amateur Radio** community, and not as just a means of reducing the administrative overheads within the ACMA. **Any new system MUST be aligned with those changes already legislated by the ACMA (LCD 2019).**

Match the licences logically with the LCD and there can be little argument, however, without addressing these basic issues I respectfully suggest that with your proposal, notwithstanding reduced licence fees, all you achieve is a change in name only while retaining the frustrating and illogical restrictions and access to frequency bands that under the LCD pose no increased risk to interference management. If a Foundation licence holder is qualified to transmit on 40m, then why not 30m? Why not 20m or 6m? Why have 50MHz to 52MHz Advanced licence only and limit Standard licences to 52 to 54MHz? – No amount of technical knowledge facilitates that... yet an F Call with little to no radio theory is permitted to build a 6m transmitter. The current system is devoid of logic.

I urge the ACMA to please use this as a great opportunity to open up Amateur Radio and attract many more people to this wonderful hobby and encourage our youth to enter a career in advanced communication. When you amended the LCD applicable to the AOCP(F) in 2019 you saw no increased risk to interference management. Perhaps the current level of theory as per the Foundation to Standard upgrade might be of good general knowledge – but I fail to see a need for it. Whatever option you select, or perhaps develop further options, I strongly recommend that Regulations and Operating procedures be tested to a much deeper level than currently applies. As you have recently amended the LCD indicating that the theory is not required to build test and operate – what other reason is there to know the difference between a Colpitts and Hartley oscillator?

I do not support Option A the retention of the status quo. It achieves nothing.

I do not support Option B – It is fine right up until you state you retain the current qualification (theory testing) requirements... There is no logic and is still far too restrictive.

Option C – Removes any ACMA responsibility /control over interference management and fails to remove the theory requirements vs band allocations – it too is restrictive and does not achieve the aim. So, what else?

I believe the solution is closer to Option B – however please consider my points about frequency/band allocations for all amateurs and the lack of logic behind the level of theory testing. Look at what overseas countries have and continue to achieve. Don't be steered by the "old school" hams who because they are happy with their lot, can see no benefit to any change.

Look to the new – look at what others have already successfully introduced. Reduce the three-tier licence system to just two 'Foundation' and just one higher level – a merging of Standard with Advanced – Reduce the ridiculously high testing of theory and open up the frequency bands.

This is a HOBBY which can provide a very useful service in times of crisis – but it is a hobby first and foremost.

I have tended to repeat a constant message in this submission – I make no apology for that.

I note the WIA, during a recent live on-line presentation, invited views to access a standard 'form letter' being made available by the WIA to all amateur radio operators so that without applying their own thoughts, were encouraged to support the WIA's stance on Option A.... This is coercion. The WIA did not consider suggesting changes to the ACMA's proposals... instead they don't want any change, no progress, no innovation.... That is why I do NOT support Option A... however, there is great potential for you to meet the requirements/benefits you desire, but also bring about effective,

constructive and innovative change. Change that will ensure the growth of Amateur Radio in Australia.

Thankyou for taking the time to read this – I hope it is of use and makes some influence on the future of Amateur Radio in Australia

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