

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

Please accept my submission as a licensed Amateur Radio operator VK5LB (Since 1985).

My preference for a system of Licensing is at this time for Option A. Footnote (1)

I have serious concerns about the Option B and C.

Option B is simply too vague for consideration.

Option C has deficiencies for the following reasons,

A,

The proposal states that under the Class licence, the amateur service would now operate under a 'no interference, no protection' basis. This is contrary to the status of the in the Australian Radio Frequency Plan which grants multiple spectrum blocks either 'EXCLUSIVE' or 'PRIMARY' status. I go to great lengths not to interfere with any other spectrum user.

B.

An Amateur Radio station would be authorised to operate only if "it does not cause interference to other devices and services". The addition of "devices" is the issue. It fails to recognise that the solution to EMC compatibility problems usually requires mutual cooperation of the transmitting and receiving parties. It also fails to recognise that the fault may lie solely with the receiving device's immunity and not the characteristics of the transmitter.

C.

The proposed Class Licence wording that amateur stations must not "exceed the general public exposure limits specified in the ARPANSA Standard" requires them to show compliance directly with that Standard, removing the additional conditions afforded Apparatus Licensees. This will substantially increase compliance costs and enforcement risk for the amateur service.

D.

The proposal to remove individual Amateur Station licenses from the Radio communications Register of Licences(RRL) harms the ability of the amateur service to carryout any form of self regulation. Expiry of call sign allocations to individuals has also not been considered

E.

Removal of an individual licence document that identifies the individual operator (and includes the reference to the CEPTT/R61-01 licence), will prevent Australian Amateur Radio operators from using the CEPT international Amateur Radio arrangements when travelling overseas. Various concerns around transmitter spurious emissions standards, translations of technical requirements(particularly impacting the MF and LF bands) and the handling of secondary spectrum, that further restrict the amateur and amateur satellite services

I am a long time member of the WIA.

Please Note.

I completely reject RASA as a legitimate representative of Australian Amateurs.

The WIA organisation's position at the moment is also mine.

Here is an excerpt from their paper.

"The WIA has carefully weighed each option and has also considered the intent of the ACMA in conducting the consultation.

The WIA has concerns that the principle of "preserving operational utility" or effectively the application of a "no disadvantage" test, has **not been met with Option C**

There are considerable impacts to the operation of the amateur service with the proposal as presented.

While the WIA understands the pressures ACMA is facing to reduce costs and applauds moves to streamline management of the amateur service, the WIA believes that the ACMA Option C proposal, as presented, will significantly impact and disadvantage Australian Amateur Radio operators.

- In its current form, the WIA does not recommend that Option C be endorsed. Option B is also risky, due to the lack of supplied detail.
- The WIA does not recommend that Option B be endorsed. This leaves the WIA in the position of needing to support Option A at this time, noting however that this will not satisfy the ACMA core objective of reducing costs and overlooks the potential opportunities in Option C.
- The WIA recommends Option A be endorsed. "

I learned a valuable lesson from the High Power "Trial" in that the ACMA has its own position on Amateur matters and will follow its own course regardless. I lost a lot of faith in the process as a result of the conduct of that farce and, as a result, I am most concerned about this upcoming determination. I truly hope the ACMA is acting in good faith.

So my position is detailed in a copy of an email I wrote to another Amateur.

"The WIA is very aware that ACMA is under great pressure to reduce its costs. The WIA has indicated that it believes there is a way forward for ACMA to modify the option C proposal that would address its concerns. Should the ACMA choose to do that, then the WIA would be willing to consider recommending option C.

The WIA non negotiable items relate to:

- * interference to devices being solely the amateurs responsibility (not the case currently)
- * the framework under which the Amateur Service currently operates for EMR safety needs to be properly included in any Class Licence proposal (direct reference to the ARPANSA standard will dramatically increase compliance costs for most amateurs)
- * provision of an individually identified "Licence" officially granted to an individual is required to fulfill CEPT licensing and other international licensing portability requirements

* retention of individual licence records in the Radio communications Register of Licences and methods to handle call sign reassignment after someone becomes a Silent Key

* several technical drafting errors that would significantly (most likely unintentionally) increase the emission standards the amateur service needs to comply with, as well as issues around TX power definition for LF and VLF bands

Fix those key points (all of which appear fixable) and then the draft Class Licence instrument would be in a form that could be endorsed.”

Please consider the integrity of the Amateur Service which is a valuable resource for the Community when making a determination about our future. We are a talented significant group of qualified people who are a responsible and legally compliant group.

Thank You,.

Dean Probert
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VK5LB

Footnote (1)

[https://www.wia.org.au/newsevents/news/2021/20210310-1/documents/WIA%20Poll%20-%20Introductory%20Paper%20-%201.7%20\(Final\).pdf](https://www.wia.org.au/newsevents/news/2021/20210310-1/documents/WIA%20Poll%20-%20Introductory%20Paper%20-%201.7%20(Final).pdf)