

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

**REVIEW OF NON-ASSIGNED AMATEUR AND OUTPOST REGULATORY  
ARRANGEMENTS – CONSULTATION 01/2021**

Dear Mr Brody,

Thank you for the opportunity to comment on the Review of Non-assigned Amateur and Outpost Regulatory Arrangements – Consultation 01/2021.

Having held an Amateur Radio Licence for over 50 years and having worked in the Spectrum Planning Branch and the Communications Laboratory of the Department, where I redrafted the Australian Emission Standards for AM and FM Broadcasting, I respectfully submit the following observations and comments:

In summary, the three options presented in the Consultation Paper are to:

1. Retain the existing apparatus licensing arrangements and licence conditions.
2. Simplify the current licensing arrangements and licence conditions by amending the amateur LCD.
3. Move to class licensing arrangements for amateur stations with assigned amateur stations (e.g., repeaters and beacons) authorised under apparatus licensing as at present.

I appreciate that the ACMA seeks to preserve the current operational utility for licensees, while simplifying the regulatory regime, largely to save money for all concerned.

I have always felt that neither a Class Licence nor an Apparatus Licence fits well for the Amateur Service, and a move to a Class Licence, of itself, may be of little consequence. However, in my opinion, there are major problems with option three as presented, which I understand is the option preferred by ACMA.

My major concern is the possible move to a *No-Interference-No-Protection* regime. This would have disastrous consequences for the Amateur Service. At present, we feel that we have recourse to a final arbiter with the force of the law in resolving interference issues. (While fully appreciating that we must attempt to resolve issues before seeking any ACMA investigation or arbitration.)

As presented, the (preferred) option (3) would remove all protection for licensed Amateur Operators and may require the Amateur Operator to cease operations on the basis of any complaint.

Noting the appalling EMC standards of much of Australia's domestic electronic equipment, where lowest price rules, and probably Free Trade Agreements have not helped, we have a

vast population of apparatus that is highly susceptible to EMR, and that generates high levels of EMI. Together with some of the irrational 'health' nonsense that we hear about in relation to 'electromagnetic radiation', the impact on lawful and safe amateur operations could be terrible.

For my part, I would rather pay an *increased* licence fee (perhaps \$40 or \$50 extra) per year that could adequately fund ACMA Interference Resolution Officers, together with a Licence that provides protection for the lawful operation of an Amateur Station.

A second major concern for me is that of 'Intruders' and the related policing of our Bands. Part of my proposed Licence Fee increase might also fund more action to help remove the Intruders from the Amateur Bands. I can understand that foreign military operatives have little concern for the Amateur Bands, and that the ACMA may struggle to effect improvements, but the number of Intruders routinely present in our Bands is a significant and growing concern.

Thank you once again for seeking submissions for your Review.

Yours sincerely,

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31<sup>st</sup> March 2021.