

# Submission re Review of non -assigned amateur and outpost regulatory arrangements – consultation 01/2021

My name is Mr David Rodney Marsland. I have been a licenced Radio Amateur for 57 years. I currently have an Amateur Advanced Licence using the Callsign VK7DM. I have the following applicable certificates - Radiocommunication Operator's General Certificate of Proficiency (issued 1979), Amateur Operator's Certificate of Proficiency (issued 1967) and Amateur Operator's Limited Certificate of Proficiency (issued 1965).

Having reviewed the applicable documents relating to the proposed legislation to change the Amateur licence type from Apparatus to Class Licence I offer my following findings. When comparing the [Radiocommunications Licence Conditions \(Amateur Licence\) Determination 2015](#) and the proposed [Radiocommunications \(Amateur Radio Stations\) Class Licence 2021](#) there is no change or added restrictions to the conditions I currently operate under. From my understanding the reason for the change being proposed is that the non-assigned stations opening in the Amateur Service better fit the Class License category rather than the Apparatus Licence category which provides for allocated frequencies at specific locations and thus can be used in the frequency allocation process. There are other concerns I see with stringent equipment approval requirements which is the case for most apparatus licenses and from which amateur equipment is exempt from. I would not like to see a restriction placed on use of 'home built' radio transmitting equipment.

One concern I have with my Amateur Licence being issued under the Apparatus Licence Rules is the requirement to record details in the ACMA [Register of Radiocommunications Licences](#). This details my contact address which in my case is also my station location and is open to the public to view. As I have valuable equipment at my home including radio communications test equipment, expensive amateur radio transceivers and irreplaceable items of home constructed equipment I view this as a security and privacy issue.

The only minor fault I can find with your draft document is the omission of any reference to a "series of transmissions " in Part 3 - 8 (Using call signs during Operations).

In my opinion the proposed change will simplify the licence rules and requirements for Amateur Radio Operators to conform with and therefore I am in agreement with (Option C) the ACMA changing the Amateur Service to a Class Licence.

Thank you for the opportunity to comment.

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