

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
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Brad Dolphin (VK2WD)
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1st April 2021

Re: Consultation paper – Proposed changes to amateur licensing arrangements February 2021

Dear Sir,

Thank you for the opportunity to review and comment on the above consultation paper.

The amateur service in Australia has come under a number of changes in recent years that from my perspective have not been in the overall best interests of the amateur service long term.

The amateur service worldwide has pioneered many advancements in radio communications since the early days of its inception well over 100 years ago.

Although the potential for significant new breakthroughs in radio communications these days are more likely to come from other avenues, the amateur service retains a vital role in teaching, mentoring and providing a practical environment for people to learn about radio communications.

The Australian radio communications industry has seen significant reductions in manufacturing and engineering capabilities over the past 15 years with a real risk that the motivation and impetus for younger people to enter the industry is greatly diminished these days.

For me and many other amateurs I associate with, the interest in amateur radio is primarily a technical and experimental one. Professionally I am an Electrical Engineer who has spent over 40 years in the radio communication industry in Australia with my fundamental motivation for entering this profession beginning with an early interest in amateur radio.

It is with this in mind I am responding to your consultation paper. Fundamentally any changes to the amateur radio licensing conditions that will lead to a reduction in the utility of the service should be avoided at all cost.

I therefore can only support Option A at this time.

Option B and C as presented are likely to result in a longer term reduction in the utility of the amateur service and not the support the primary objective of the amateur service as I believe it should be.

The specific aspects of the current licensing system that need to be retained in order to provide an environment to sustain the utility of amateur radio include the following:

1. Demonstrate an appropriate technical knowledge to obtain an operating license.

To retain a technical relevance to the amateur service, an appropriate technical knowledge should be demonstrated in order to obtain an operating license. The current three tiered licensing arrangement provides sufficient flexibility and motivation to enter and progress through the license grades in return for greater operating privileges.

Although not directly referenced in your consultation paper, the move to reducing costs and discussion about self-regulation and single licensing arrangements, provide an environment to further reduce the entry requirement into the amateur service and motivation to expand ones knowledge base.

Any reduction or lowering of the technical standards to obtain an operating license will lead to a shift in the focus of amateur radio away from promoting the technical advancement aspect of the service.

2. Protection from interference to primary and secondary allocations

The radio spectrum like any environment these days requires protection from pollution either intentional or unintentional.

The notion of moving to a class licensing system where protections are removed is absolutely not in the interest of the amateur service and must not be traded off against a reduction in licensing fees or perceived costs.

Interference to amateur radio transmissions should be treated in a similar way to interference in the reception of other licensed broadcast stations – it needs to be investigated by an authority who has the power to resolve both intentional and unintentional interferers.

Unlike the general public, the amateur service is able to provide initial investigation into the sources of interference and as such can reduce the burden, to some extent, on the initial identification of interferers however there needs to be an authority that has the power to determine the outcome of these instances. This determination and enforcement role needs to be maintained by the ACMA.

3. Call signs and license classes

It is regrettable that recent changes to the structure of call signs in Australia where the association between license grade and operating privileges has been removed from the call sign format.

It is my view that the arguments put forward for this change were flawed and not associated with apparent operating restrictions of the foundation license but related to a longer term objective of a single license grade which would ultimately be the lowest common denominator in terms of technical and operating qualification. This is not in the longer term interest of promoting a technical based amateur service nor was it relevant to promoting further uptake of foundation licenses.

Part of this argument put forward by the WIA included a push for operators to access the ACMA database to verify or determine the operating grade of a particular licensee. This is a very retrograde step pushing some onus on amateur operators to enforce operating privileges of other stations which would otherwise be obvious from their call sign.

The move to a class license would remove any referenceable source to verify a station is operating within their license conditions.

4. Regulatory framework, self-regulation and non-mandatory operating procedures

It is my strong view that the amateur service requires a strong regulatory framework in order to support the stated objectives I referred to previously. I do not see any need or reason why adopting non-mandatory procedures is of benefit to the amateur service.

I have not seen any arguments suggesting the amateur service would benefit from a reduction in operating procedures and standards.

In addition, as discussed further below, I do not see how the amateur service could implement a self-managed operating frame work.

5. WIA as a representative body of the Amateur Service

Although I have been a financial member of the WIA for many years and currently remain so, I am concerned the WIA is no longer engaging the amateur community in a way that supports direct feedback by its members on critical aspects affecting the amateur service.

It is my view that the move to a federal WIA board structure as opposed to the longer standing state based model, has resulted in an organization that only solicits engagement of it members by way of very structured and to some extent self-serving polls, as and when it chooses.

As such, I appreciate the ACMA soliciting direct feedback on any current and future regulatory changes.

It is with this view that I am very concerned about how self-regulation would work in an environment where there is no overarching group that is has demonstrated an ability to listen, respond and engage with the broader amateur community.

I am therefore not supportive of a move to a self-regulation in the current amateur environment.

6. Overall support for the views expressed by the WIA in their draft response V1.1

At the time of writing this response, I have only seen the WIA's draft response V1.1. I am not aware a final version has been published for review and comment by members. Again, this is a concern as the WIA claims to be the body representing the amateur service.

Notwithstanding the above concern, I am in general support of the points raised by the WIA in their response to the consultation paper subject to where they differ from direct arguments expressed earlier in my response.

Again I appreciate the opportunity offered by the ACMA to express my views on proposed changes to the licensing arrangements for the amateur service.

Yours sincerely,

Brad Dolphin (VK2WD)