

By Email

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In relation to

# Proposed changes to amateurlicensing arrangements

## Non-assigned amateur stations

Consultation number

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Thank you for the opportunity to provide some thoughts

I understand that the possibility to transition non-assigned stations to class licensing arrangements (identified as Option C) is the ACMA's preferred position and that this is the one that will prevail. I can see value in this proposal especially for the ACMA in reduction of effort to administer those aspects of Amateur Radio.

There will have been other more professional responses that th ACMA will have received and the one that most accords with my views is that publicised by the Radio Amateurs Society of Australia. However there are some aspects of this proposal that I would like to comment on specifically.

Option C. is suggested as having no fee attached and without any protection from received interference.

However ,

Quoting from your Consultation paper

"Amateur stations authorised under the proposed class licensing arrangements would allow amateur users to operate on a 'no interference, no protection' basis that is typical of class-licence arrangements. This means that a person is authorised to operate an amateur station under the class licence on the condition that it *does not cause interference to other devices and services, and will generally not be afforded any protection, should it experience interference.*"

And further "Non-assigned amateur licensees currently operate on *shared frequencies* and are similarly afforded no protection from interference. Our view is that in transitioning to class licensing, managing the risk of interference will remain largely unchanged from the current arrangements."

All Radio Amateurs SHARE the same set of allocated frequencies and I understand this to be the intent as quoted in your consultation paper.

Interference can be caused by devices other than Radio transmitters. For example it may originate from devices operated by Power distribution companies, or from devices used in the delivery of internet services, Solar panel ancillary equipment, battery chargers, LED lighting.. the list goes on.

Ordinary citizens in Australia uses their TV, AM or FM radio. There is no licence associated. No fee paid. But if that person experiences interference on those devices they have the "right" to escalate to the ACMA for investigation/action/mediation. So why would this group be entitled to receive radio signals but with protection from received interference?

In other words, the price that the Amateur Radio population pays for a Class no fee licence is no protection from interference. This seems hardly equitable. Radio Amateurs are being treated a second class citizens and differently to the general population.

I feel that the clause 'no interference, no protection' is unfair and should be removed specifically. It is an inequitable regulation and decision.

As written the Amateur Radio will be expected to accept interference from any device what so ever with no recourse to relief.

Further

*"..managing the risk of interference will remain largely unchanged from the current arrangements."*

I find this an interesting statement. I understand that the current Apparatus licences do not include a 'no interference, no protection' provision. I am aware that reports made to the ACMA of received interference are receiving a standardised reply:

"The ACMA has assessed your request against its compliance and enforcement policy and has rated the request as a low priority.

This means that the ACMA has noted the issue but will not be commencing a resourced investigation into this matter at this stage."

In my opinion the comment in the consultation document *"..managing the risk of interference will remain largely unchanged from the current arrangements."* is **not** an indication that the risk of interference is minimal or not increased as a result of a Class Licencing system, but more that the ACMA has not carried out its responsibilities in the past and this would remain and continue into the future.

Quote “ Simplification of Licence Conditions.

If Option C is implemented, we would develop the amateur operating procedures to provide guidance to amateurs. In the future, it is proposed that managing and amending these procedures could be managed by the amateur community.

Compliance with such procedures by amateur radio operators would be voluntary. The ACMA would not be responsible for enforcing compliance with the amateur operating procedures.”

The concept of “procedures to provide **guidance** to amateurs” and “**Compliance** with such procedures by amateur radio operators **would be voluntary**” seems to me to be counter intuitive.

Procedures typically mean a specific set of well defined steps to avoid problems and errors in order to achieve a desired outcome. i.e. to get it right.

“Guidance’ suggests some leeway is available to the operator.....

Then “Compliance... would be voluntary” quite clearly indicates the procedures do not have to be followed.. and

“the ACMA would not enforce compliance” and

“managing and amending these procedures could be managed by the amateur community.”

So we have procedures, that are guides, which are voluntary, and will not benefit from the leadership of the ACMA but is expected to be managed by the Amateur community, a cohort that is not united, nor effectively represented. May I ask you to reflect on to the Syllabus Review Committee that, even under the chairmanship and guiding hand of the ACMA, failed dismally? This is in my opinion a recipe for utter chaos.

Thank you for the opportunity to present some ideas.

Yours Sincerely

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