

# **Review of non-assigned amateur and outpost regulatory arrangements**

## **Community Consultation**

Feedback from John McMullan, VK4ZI

I would like to thank the ACMA for the opportunity to provide feedback on the proposed changes to licensing conditions.

## **My understanding**

My understanding of the purpose of the proposal in simple terms is to reduce administrative overhead thus reducing operational costs for ACMA whilst providing a similar level of operating conditions to the Amateur Service. Whilst the goal is laudable, Options B and C provide a level of risk and additional responsibility onto the Amateur service and individual operators in several ways as outlined later in this document. I have not addressed these items in accordance with the options but rather the risks as seen with the preferred Option.

## **My Response**

As the options are presented, I cannot support anything other than Option A. I do believe that quality consultation with the community may result in better definition and conditions for the preferred proposal, however this is not currently evident within the option C. Unfortunately, option B does not have sufficient information to assess the option adequately.

## **Summary and general feedback**

If the requirement is to reduce overheads and resource requirements, perhaps this can be achieved in a less drastic way by undertaking a study of where the actual resourcing and costs are incurred and examine better options to undertake these. Of importance is the level of effort to administer the license system. A simple suggestion is to make long term license periods financially attractive so that the Amateur Service finds them more palatable, thus reducing the effort required to administer. I am assuming that the goal is to maintain at best a financial break even for the administration. As an example, if a 10 year license was offered at the cost of a three year license, most amateurs would select that option, reducing the administration overheads by a significant amount. The current discount of \$2.00 per year for each additional year opted in for the license is by far the biggest detractor for most users to take up a multi-year option. A second suggestion is to make sure that all the automation in the system is applied (both by the department and the license holders) and is functioning correctly to allow amateurs to renew licenses very limited departmental effort.

A key item to note is that any change proposed should not be detrimental to the Amateur Service by altering regulations that degrade conditions under which the service operates. I have provided commentary later in this document in regards to some of the proposed conditions in Option C that will degrade the conditions of the Amateur Service.

In summary, I believe that effective cost saving methods can be found particularly with quality consultation with key Amateur Community representation. This may shape a better option that meets the criteria of both the department and the Amateur Community.

## Specific Feedback

### 1. Class licensing and equipment

Class Licensing as currently implemented requires a defined set of technical requirements and a product that is categorised as meeting that requirement (ie CB Radio must be labelled that the product complies with the technical requirements).

The Amateur service is not compatible with this basic definition due to the service being an experimental service that builds, modifies or utilises equipment that performs within the emission types and operator qualifications. This may have a detrimental effect to the Amateur Service where the experimentation and home construction of equipment will no longer be possible.

### 2. Class Licensing and ARPANSA defined exposure limits

Proposed Option C wording indicates that amateur stations must not exceed the public exposure limits outlined within the document.

Whilst this document is comprehensive, it does not pass the 'normal person' test. The application of the document requires specialist calculations and use of measuring equipment that are outside the realm of the typical amateur. Requiring a normal person to apply engineering principles and calculations that require are equivalent to university degree level does not promote the amateur service. In addition, policing this requirement may be outside the capability of all but specialist organisations.

Additionally, when reading through class licensing documents, this document is not applied to any typical user class license.

### 3. Class Licensing and equipment purchase.

The act requires purchasers to supply and suppliers to request a copy of the purchaser's license prior to supply of restricted equipment such as amateur radio transceivers.

Under the proposed Option C, Equipment will no longer be able to be purchased as licenses per se will not be issued.

### 4. Class licensing and spectrum re-allocation

The Act requires consultation with apparatus license holders whereas class license holders receive no consultation. This prevents the Amateur service to provide valuable community advice to the ACMA in regards to Spectrum changes that may be optional or detrimental to the Amateur Use of the Spectrum.

5. Class Licensing and overseas travel with radio use.

Under Option C, Amateur operators will no longer be compliant with the CEPT international Amateur Radio arrangements therefore unable to travel overseas and operate or even transport amateur equipment with them.

6. Class Licensing and interference.

Interference under the current regulatory arrangements provides a modicum of assistance to the Amateur Service when interference is encountered. Whilst this assistance is noted to be limited and will diminish under a class license, the conditions of a class license also include devices in addition to radio interference. The risk in this instance is when a device is poorly designed without any protection from RF frequencies outside the range that the device is designed to operate. Whilst the Amateur operators do take proactive steps to assist when interference occurs to receiver devices, it will become almost impossible to rectify poorly designed products whilst placing the responsibility onto the amateur operator to rectify a poor quality product to be able to continue.

End of feedback.

Kind regards,

John McMullan