

Proposed changes to amateur licensing arrangements - ACMA Consultation 01/2021

Submission by John Edwards BE VK4IE

1. Introduction: The amateur service says: "When required amateur radio operators also provide a substitute form of communication in civil emergencies." As preparation, amateur groups have for many years trained in this type of operation under the umbrella of WICEN, in many cases using attended portable repeaters on specific channels in the VHF and UHF bands. Such operation of portable repeaters would seem to be precluded by section 9(2)(b) of the draft Class Licence conditions. Additionally, many amateurs use GPS position reporting using beacons on VHF and/or UHF which would also appear to be precluded by section 9(2)(c) of the draft Class Licence conditions. These restrictions are considered an un-necessary restriction on amateur stations assisting the community.

2. Options; Option C, Summary of changes says "ACMA's administrative costs relating to the issue and renewal of amateur apparatus licences.....will be reduced., yet in the introduction "As of 27 January 2021, there were 1476 non-assigned amateur licences in Australia"

Some few paragraphs later is the comment "for an annual renewal (\$4 renewal charge and \$50.91 annual tax amount". Primary school arithmetic shows the ACMA would save around \$59,000 per year on renewal costs - not even the salary for one lowly staff member. Also "Spectrum tax" of over \$810,000 would disappear.

3. Amateur licensing: Overseas recognition of Australian amateur licences and relevant qualifications is important to amateur operators. The CEPT regime must be retained as the alternative would require individual licence applications for each country visited by a travelling amateur

4. "No interference, no protection" for the most part is the reality over many years. However there have been cases where interference from other licensed services has occurred and have rightfully been resolved. Also I see no reason why unwanted interference from some non-licensed device should not be resolved if possible.

"No interference" is treated in the draft licence conditions document part 10(1) "A person must not operate an amateur station if its operation causes harmful interference to radiocommunications." This should rightfully be the case considering most communications services should be using type approved equipment. Under option C, the ACMA Register of radiocommunication licences would presumably no longer contain details of individual amateur operators now required by law. This would make tracking of an interfering amateur station difficult given only a callsign.

"No interference" to "other devices and services" an onerous condition in that there are no known standards in Australia for emc immunity of "other devices".

"No protection" is an onerous condition given the insidious increase in RF noise generating devices particularly in the HF spectrum. Such non-radiocommunication devices include:

- 'LIPD' devices which are clearly shown to be other than low interference potential devices. These are in a secondary service band admittedly, but still cause interference to amateur operations.
- switch mode power supplies for such as LED lights etc where cost reduction is a big factor.
- inverters used in solar power systems. Some systems are very well engineered, others are abysmal.
- 'wireless' charging of phones and other devices using near field RF.
- possible use of high powered 'wireless' charging of electric vehicles. The possibility of severe local interference from such devices is very real.

While various overseas and local standards require certification of compliance (mostly self-assessed) there appears to be no on-going checks to ensure products imported and/or sold on the local market continue to meet the certified standard.

5. On a cosmetic note, Part 12 Operation of the draft Licence conditions section (4) "Nothing in this section limits the conditions in sections 14 and 15." Section 15 is printed with invisible ink, or is a mistake.

Overall comments: The consultation document 01/2021 leaves many questions, and has some anomalies. Given the parts of option B and option C that are not fully explained, they should not be considered as a viable option with further explanation. Administrative savings to the ACMA are shown to be ephemeral, leaving Option A as the preferred option, with perhaps some alterations to licence conditions to reflect current strategies.

John Edwards 18 March 2021.