



Great Lakes Radio Club Inc.

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The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne VIC 8010

Via email: SLPSConsultations@acma.gov.au

Submission on behalf of members of Great Lakes Radio Club Incorporated on the proposed changes to amateur licensing arrangements, non-assigned amateur stations

The Great Lakes Radio Club Incorporated (hereinafter referred to as the Club) thanks the Australian Communications and Media Authority for the opportunity to make a submission in regard to the proposal to consider transition to a class licence structure.

The Club represents licensed amateur radio operators in the Great Lakes region of the mid north coast of NSW. The names and call signs of those members supporting this submission appear at the conclusion of the submission.

Summary

In considering the options proposed by ACMA, the overwhelming consensus of the Club is that the ACMA's first option, Option A as outlined in their consultation paper, is the preferred option.

The Club considered the consultation paper to be too generally lacking in detail as to the full implications of either options B or C to permit informed support for anything other than maintaining the status quo at this time.

The Club acknowledges that there are potentially some advantages in transitioning to a class licence and therefore does not rule out supporting the option of a class-style licence in the future provided it can be developed in such a way that it does not diminish or disadvantage amateur radio in Australia when compared to the status quo.

Option A

For the purposes of this submission, any comments in support of Option A would essentially have the same effect as comments opposing Option C.

Members of the Club are of the opinion that only Option A offers any certainty.

Option B

The Club found the inclusion of Option B somewhat baffling.

The ACMA themselves note that this option does not deliver any cost benefit to either themselves or to amateurs.

Members of the club considered it impossible to either support or oppose Option B because there is no detail beyond a rather nebulous “simplifying the amateur LCD”. It is unclear what “simplifying” would actually involve in practice.

Option B might involve relatively minor and benign changes to the amateur LCD or could involve changes which are significant and far reaching in their impact. The Club could not reasonably support or oppose vague changes and as such Option B was not considered.

Option C

The Club opposes Option C ... the proposal to transition to a Class Licence.

Option C is opposed on the grounds that there are simply too many uncertainties and unanswered questions to permit an informed opinion. Some of the concerns raised by members of the Club are detailed below.

A class licence means no government issued individual licence document despite such a document often being required or requested by both domestic and international authorities such as police, airport and other travel related security personnel, customs and border force, etc.

A government issued licence document is currently required to enrol in many international amateur radio related services such as EchoLink, eQSL or LoTW or to obtain something like an ID number to use DMR.

The question of how a class licence will comply with CEPT requirements and the reciprocal rights of Australian amateurs visiting overseas countries does not appear to be addressed. A certificate of proficiency is not sufficient for these purposes because it does not prove a current or valid licence to operate and does not link a call sign to an individual.

No amateur licence holders in the Register of Radiocommunications Licences thereby removing a core aspect of self-policing. Carried to the logical conclusion the lack of an accurate, searchable, public database means that anyone, qualified or not, could simply invent and use a call sign on any amateur band and very few would be any the wiser. AMC currently offers a database of publicly available call signs but they do not offer a database of currently allocated call signs and the respective holders.

Members of the Club have concerns that services such as maintaining a database of call signs and the respective holders may fall to third parties. In light of recent and ongoing experience, members of the Club have very little confidence in the ability of third party organisations to provide a consistent or satisfactory level of service, particularly when those organisations possess little understanding of the nature, history and culture of amateur radio. Recently released Freedom of Information material confirms that third parties consider amateur radio matters to be a low priority.

There appears to be nothing which, under a class licence system, obliges third parties to provide services equivalent or even similar to those currently provided to radio amateurs by ACMA or other sources. Radio amateurs could simply be left out in the cold in this regard. ACMA sees outsourcing as a “key benefit” while members of the Club see outsourcing as placing amateur radio at risk of compromised levels of service.

The disappearance of individual client numbers for amateurs means that when dealing with ACMA, amateurs who are qualified to the extent required by ACMA and who hold an amateur call sign would be indistinguishable from an unqualified random member of the public. There are some interactions with the ACMA (for example registering interference complaints on line) which cannot be accomplished without the use of a client number.

Lack of protection from interference. This topic has caused by far the most dissent. Australia has formal standards applying to devices which can cause interference or are susceptible to interference, but these standards seem to be largely ignored to the great detriment of the amateur radio service.

The addition of the word “device” is very significant.

Grossly sub-standard “devices” appear to be imported into Australia with impunity.

A class licence which specifically precludes any protection from interference caused to amateur operations from ANY “service or device” ... but which is punitive in the approach to interference caused to sub-standard or non-compliant devices from legally and responsibly operated amateur radio equipment is simply unacceptable.

The consultation paper suggests that a class licence means no regulatory oversight and members of the Club have concerns that amateur bands being specifically excluded from interference protection provisions invites targeting of those bands by both non-approved services and devices.

Things like the use of the AX prefix would be “transitioned to general recommendations” ... but how binding are “general recommendations”? ... and is there potential for things such as regulating the use of the AX prefix to fall into the hands of unsympathetic third parties?

There is no apparent provision under the proposed class licence system for dealing with the call signs of deceased holders or the re-issue of call signs.

The consultation paper suggests that under a class licence, operating procedures would be developed. These procedures would become the responsibility of the amateur radio community and that compliance with those procedures would be voluntary. The paper states that “*ACMA would not be responsible for enforcing compliance with the amateur operating procedures*”. How does this work when the amateur radio community has no authority and no legislative or regulatory backing to “enforce” anything?

In conclusion, the overriding principle embraced by members of the Club in considering any change to existing amateur licensing arrangements is one of “no harm”.

The effects of any change in licensing arrangements should as a minimum be neutral and should not incur any disadvantage to the operation of amateur radio in Australia when compared to the status quo. The members of the Club do not feel the model proposed for transition to a class-style licence meets that criteria at this point.

Great Lakes Radio Club members supporting this submission:

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Andrew Keir VK2AAK / VK2UE, Secretary, Great Lakes Radio Club Inc.

Shayne McBride VK2XUV, Treasurer, Great Lakes Radio Club Inc.

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