

Submissions To: ACMA, The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne VIC, 8010

From: Matthew Ayres
1 Uralba Place
North Wahroonga, NSW 2076
1st April 2021

Re: Proposed changes to amateur licensing Regulations that significantly disadvantage over 15,000 Australians.

This paper is jointly sent to the Minister for Communications, the WIA, ARNSW and ACCC for uniform and open disclosure.

Dear The Hon Paul Fletcher MP, the ACMA, Mr Greg Kelly (President WIA¹), Mr Matthew Magee (President ARNSW), the ACCC²,

The ACMA released a paper named “Proposed changes to amateur licensing arrangements, Non-assigned amateur stations” in February 2021. The ACMA proposal raises material concerns which are outlined in this document.

This paper finds the justification as to ACMA removing amateur radio apparatus licences is unjustified and the ACMA proposal paper Option-C is misleading.

In fact, it is argued the paper intentionally misleads stakeholder readers to believe they are no worse off by using legal tactics to hide the facts and by lack of disclosure lead those amateurs currently empowered and protected by law to decide a course of action that is materially and irrecoverably detrimental. Some call this *unconscionable conduct*. I do not expect the ACMA intended this, however the facts remain. The paper in my option should have had significantly more open disclosure, should not have misrepresented the facts and should have allowed well more than 8 weeks to consider its merits, given its stated intent.

This investigation shows in fact with a shift to class licence, ACMA extinguishes significant amateur licensee rights for 15,000 Australians which are directly in conflict with the ACMA requirement (and Government policy) to maintain all current amateur licence benefits.

This response document makes clear recommendations to ACMA that can both meet its cost savings goals *as well* as retaining amateur radio benefits, *while also* meeting all Government policy needs.

In summary, AMCA should reject Option-C as proposed and pursue Option-A (no change) in 2021 and commence a series of recommended actions (listed below in bold)

¹ See Appendix-C for summary of WIA, ARNSW and Amateur Clubs

² ACCC have lodged this paper under Ref 3285221

that meet Government productivity goals and several of which can deliver early results within 90 days. This indeed is *good policy*.

Summary Recommendations: A: Establish Clear and Accountable Policy Reform

Accountable Policy Reform	<i>Recommendation #1: That ACMA within 90 day provide a report that shows a monthly set of KPI's for all AMC outsourced services that is made public and spans back each month for 3 years. The report be sent to the Minister for quarterly review. The report will list each service, the actual performance achieved and a comparison to the benchmark metric used. The report will show what actions are being taken to improve services in order to meet the publicly stated Government agenda.</i>
Lift Productivity	<i>Recommendation #2: That in the case the AMC is unable or does not meet stated productivity gains (based on the service levels prior to AMC outsourcing) on all KPI's by December 2021, then the service be made open to any party, including AMC, WIA, ARNSW or others to manage the service in order to indeed meet the improved Government mandate.</i>
Lift Engagement using Industry Standards	<i>Recommendation #3: That ACMA, by Jun 30, implement Net Promoter Score for all AMC activities and a 10% sample of all people using the service be emailed to give feedback every month (using the industry standard rating 1-10) on the actual service provided. This is a standard process used by the very large majority of professional services in Australia.</i>
Use Clear Definitions	<i>Recommendation #4: That ACMA adopt a fair and clear definition for amateur radio, that states that Amateur Radio has been established in Australia for over 100 years and its purpose is:</i> <ul style="list-style-type: none"> <i>to promote, develop and support the radiotelecommunications field;</i> <i>to support, train and upskill professional operating and technical standards in radio telecommunications;</i> <i>to promote learning, innovation and technical experimentation;</i> <i>to ensure professional standards are understood and adhered;</i> <i>to use and demonstrate the professional use of radio telecommunications equipment</i> <i>to use the allocated amateur spectrum professionally;</i> <i>to meet all aspects of the apparatus licence, LCD and wider regulatory requirements;</i> <i>to show, use and support the wider community in how radiocommunications can aid in mitigating risk in normal community, often remote or sometimes hazardous events;</i> <i>to be a ready and willing national capability for civil emergencies;</i> <i>be a service that reduces risk in major events such as fires, floods and power outages where traditional services may fail, placing lives at risk.</i>
Use Clear Definitions	<i>Recommendation #5: That ACMA state for its internal and external communications and definitions that amateur radio includes a mix of professional, semi-professional and community service people and capabilities, linked to the grade of licence holder and club participation.</i>
Use Clear Definitions	<i>Recommendation #6: That ACMA refrain from using the label "hobby" which does not present a fair and clear definition of the amateur radio community.</i>

Summary Recommendations: B: Protect Rights and Lower Costs using good Policy

Targeted Policy Reform	<i>Recommendation #7: That ACMA formally identify and document the benefits of amateur radio so ACMA are informed as to how to deliver them efficiently (cost) and maintain them (services utility) under any proposal to change policy.</i>
Consumer Rights	<i>Recommendation #8: That the ACMA will not extinguish the legal right of amateurs including their current asset defined under S106A of The Radio Communications Act 1992 and also defined under Competition and Consumer Act 2010.</i>
Reduce Interference	<i>Recommendation #9: That the ACMA empower the amateur community to aide in the reduction of interference as well as keeping apparatus licences so the provision and protection of the act is enforceable.</i>
Not use unhelpful models	<i>Recommendation #10: That the ACMA explicitly reject the Citizens Band model and its known issues be used for amateur radio spectrum de-regulation.</i>
Simplify, Reduce costs	<i>Recommendation #11: That ACMA make all amateur licences the one uniform cost (being the current 2021 annual fee of a Standard Licence), with the cost covering a 5-year licence (with no annual renewal). Every amateur licence would be issued for 5 years and only be renewed at the end of 5 years. The cost of a licence shall be indexed annually at CPI, but only charged once each 5 years.</i>
Simplify, Reduce Costs	<i>Recommendation #12: That ACMA by instrument and an appropriate fee empower WIA and AMC and registered Radio Clubs to change address and contact details for any amateur licence.</i>
Reduce Costs	<i>Recommendation #13: That ACMA stop sending (costly) annual reminder notices by mail and move to email under a delegated partner like WIA or AMC.</i>
Reduce Interference	<i>Recommendation #14: That ACMA by instrument empower WIA and AMC and registered Radio Clubs to use a set of pre-defined-forms that can be sent to residences that are known to cause interference.</i>

1.0 Introduction

Thank you for the opportunity under the Act to respond to the discussion paper named **“Proposed changes to amateur licensing arrangements, Non-assigned amateur stations”**. (herein called the *paper*). The *paper* calls for responses by 2 April 2021. This paper is a response, raising a series of issues and also provides solutions that meets all of the ACMA stated needs in regards Government mandates.

By way of disclosure, this paper is written using interviews, fact-based research as well as awareness of ARNSW, WIA, ACMA, Industry policy, Government policy and wider industry body reform. I have worked for decades in country level strategy, industry transformation, telecommunications industry transformation and for government all the way to ministerial levels.

My interest in this reform is that policy change in fact meets Government criteria as well as lifts productivity, lifts engagement and improves innovation in the telecommunications industry. In all cases this must not alienate or take away from key enablers; those people that have built this industry over many decades.

In all cases the use of regulatory power must not remove protective rights of those that indeed need protections (often individuals not major corporations). I.e., protecting those individuals and groups that nurture, experiment and source the young people that then participate and further improve the wider telecoms sector. These people enable the very dialogue, the use of new technologies and wide scale telecoms innovations by their engagement in radio frequency studies and use of radio telecoms equipment in all its derivations. The commercial and non-commercial benefits to Australia cannot be understated.

Reform, especially powerful regulatory reform, should not diminish the very protections that have been established for decades and established for good reason.

2.0 Government reform

In its paper, ACMA seeks to be “consistent with the Australian Government’s [Deregulation Agenda](#)”. ACMA seeks “better regulatory outcomes” and also considers further “self-regulation” for Amateur radio licence holders.

In considering the Government’s Deregulation agenda as recently outlined by The Morrison Government on 2 October 2020 (attached in Appendix-1) there are clear aspects of what makes good policy.

Prime Minister, Morrison stated “To be clear, deregulation isn’t about getting rid of all regulation. It’s about getting rid of unnecessary, disproportionate, and inefficiently implemented regulation.” The Assistant Minister to the Prime Minister and Cabinet made a clear distinction between “good regulation” and “bad regulation”.

Specifically, he stated “Bad regulation is a ‘Job-Killer’ with no redeeming features. It inhibits consumer choice, business innovation and investment, and jobs growth.”

He also went on to state “‘Bad regulation’ – that is regulation which is unnecessary, poorly designed or implemented:

- imposes costs in excess of any benefits
- inhibits business investment and the creation of jobs
- is a brake on productivity, undermining our prosperity.

This occurs if regulation is:

- duplicative, requiring businesses to provide similar information to multiple regulators;
- hard to find or understand
- results in unnecessarily inconsistent requirements across or within jurisdictions
- slow and costly to navigate, or,
- requires paper-based forms or outdated technology to comply

That's why I've focused this Government's renewed Deregulation Agenda on ensuring regulations are fit-for-purpose."

Finally, he says "So here again, deregulation is not about weakening, taking away or running amok."

It is explicit, the Government deregulation agenda clearly:

- 2.1 Must not inhibit consumer choice;
- 2.2 Must not imposes costs in excess of any benefits;
- 2.3 Must not be hard to find or understand;
- 2.4 Must not be slow and costly to navigate;
- 2.5 The deregulation must not weaken or take away from those that use such services.

It is with deep concern that in fact the more recent changes made by ACMA indeed breached almost every element between items 2.1 to 2.5 (inclusive) with damaging consequences. The approach was heavy handed and was not aligned with the Government stated policy reform.

Specifically, the change of service between WIA and AMC has been chronically bad. I have taken so many complaints where standards have blown out to the worst seen in decades. Imagine the return of an email after 3 months. This is a disgrace and unprofessional. Imagine operating a Government department that returned phone calls after 1-2 months. It's so poor, it must be placed clearly on the table as an explicit example of "bad deregulation".

The recent report by ACMA that all has been resolved is not evidenced by any metrics nor from any voice or benchmark from the very community that uses the services. Any reform agenda that chooses to ignore the very stakeholders that use the service is flawed and not best practice reform. One may argue it was simple outsourcing to lower cost and *materially* diminished a decades old and effective service standard.

I do indeed hold ACMA in high regard and for that reason, offer solutions with every item that I challenge. I am not one to challenge without reason, rationale and the recommendations are offered in order to improve standards *and* alleviate unnecessary costs.

Recommendation #1: That ACMA within 90 day provide a report that shows a monthly set of KPI's for all AMC outsourced services that is made public and spans back each month for 3 years. The report be sent to the Minister for quarterly review. The report will list each service, the actual performance achieved and a comparison to the benchmark metric used.

The report will show what actions are being taken to improve services in order to meet the publicly stated Government agenda.

Recommendation #2: That in the case the AMC is unable or does not meet stated productivity gains (based on the service levels prior to AMC outsourcing) on all KPI's by December 2021, then the service be made open to any party, including AMC, WIA, ARNSW or others to manage the service in order to indeed meet the improved Government mandate.

Recommendation #3: That ACMA, by Jun 30, implement Net Promoter Score for all AMC activities and a 10% sample of all people using the service be emailed to give feedback every month (using the industry standard rating 1-10) on the actual service provided. This is a standard process used by the very large majority of professional services in Australia.

It is only when clear standards of service and metrics are tracked and made public that reform indeed is shown to be effective (or not). With the Government policy clearly requiring that services “must not be slow and costly to navigate”, that ACMA needs to make change. I formally state that AMC services are unacceptably slow and have materially lowered service standards to the users of that service. I further formally state that the very design of the AMC centralised outsourcing has slowed, by design, what was a national multi-state set of services that worked well.

As the prior reform has been so poor, a careful review as to the current paper and its implications to the 15,000 stakeholders is made below.

3.0 ACMA Definitions

ACMA starts the *paper* by defining the amateur radio service. “It is designed primarily to facilitate hobby radiocommunication and technical experimentation. When required, amateur radio operators also provide a substitute from of communication in civil emergencies.” (paper, P4). This definition is misleading and misrepresents amateur radio.

Amateurs are formally trained for emergencies and distress calls and have an apparatus licence to use equipment for that very purpose, including legislative support to conduct such a service. The ACMA statement that recognises only the operator is in fact misleading, it is collectively the operator, the formal training, the equipment, the procedures and the licence together that makes such a capability of critical national importance.

Often amateur radio is a pathway to working in the telecommunications and wider technical industries. Often amateur radio provides training and regular forums for new product innovations, research and practical ways to develop new best practices. The registered club network that runs across almost every state in Australia, develops and upskills amateurs and amateur aspirants in telecoms practices. Finally, the national network encourages younger people to gain a licence qualification and then helps them rise from Foundation, to Standard to Advanced apparatus licences, while also supporting their learning needs.

A better definition of amateur radio would be as follows.

Amateur Radio has been established in Australia for over 100 years. Its purpose is:

- to promote, develop and support the radiotelecommunications field;

- to support, train and upskill professional operating and technical standards in radio telecommunications;
- to promote learning, innovation and technical experimentation;
- to ensure professional standards are understood and adhered;
- to use and demonstrate the professional use of radio telecommunications equipment
- to use the allocated amateur spectrum professionally;
- to meet all aspects of the apparatus licence, LCD and wider regulatory requirements;
- to show, use and support the wider community in how radiocommunications can aid in mitigating risk in normal community, often remote or sometimes hazardous events;
- to be a ready and willing national capability for civil emergencies;
- be a service that reduces risk in major events such as fires, floods and power outages where traditional services may fail, placing lives at risk.

The Wikipedia definition of a professional service is “Professional services are occupations in the service sector requiring special training in the arts or sciences. Some professional services require holding professional degrees and licenses and they also require specific skills such as architects, accountants, engineers, doctors, lawyers and teachers.”

They further state “A semi-profession is an occupation that requires advanced knowledge and skills but is not widely regarded as a true profession. Traditional examples of semi-professions include social work, journalism, librarianship, teaching and nursing.”

Clearly amateur radio licence holders have undertaken “special training”, hold “licences”, hold “specific skills” and regularly conduct “social work”, so meets many definitions as stated above. It is more accurate to state that amateur radio includes a mix of professional, semi-professional and community service capabilities, often linked to the grade of licence holder and club participation.

The use of the word “hobby” is not accurate and removes the amateur communities’ important role in Australia. To downgrade the discipline and negate its role is misleading. ACMA is likely to have a significant reaction from the 15,000 strong amateur radio community from such a statement.

Being accurate is in all parties’ interests, especially in regards regulatory reform.

Recommendation #4: That ACMA adopt a fair and clear definition for amateur radio, that states that Amateur Radio has been established in Australia for over 100 years and its purpose is:

- **to promote, develop and support the radiotelecommunications field;**
- **to support, train and upskill professional operating and technical standards in radio telecommunications;**
- **to promote learning, innovation and technical experimentation;**
- **to ensure professional standards are understood and adhered;**
- **to use and demonstrate the professional use of radio telecommunications equipment**
- **to use the allocated amateur spectrum professionally;**
- **to meet all aspects of the apparatus licence, LCD and wider regulatory requirements;**

- to show, use and support the wider community in how radiocommunications can aid in mitigating risk in normal community, often remote or sometimes hazardous events;
- to be a ready and willing national capability for civil emergencies;
- be a service that reduces risk in major events such as fires, floods and power outages where traditional services may fail, placing lives at risk.

Recommendation #5: That ACMA state for its internal and external communications and definitions that amateur radio includes a mix of professional, semi-professional and community service people and capabilities, linked to the grade of licence holder and club participation.

Recommendation #6: That ACMA refrain from using the label “hobby” which does not present a fair and clear definition of the amateur radio community.

4.0 Issues Arising

02.7 Apparatus licence issues

The current amateur radio apparatus licence regulations have very clear provisions that are specifically tied to this specific type of licence. The current provisions are indeed important and ACMA has stated in its paper that it plans to “reduce the transaction costs incurred by licensees, while concurrently ensuring the benefits derived by amateurs from the activity are retained.” (paper, P10). Finally, the ACMA state that “we understand that station users derive a benefit accessing the spectrum to participate in the activity, albeit one that is difficult to quantify.

It is welcomed to understand that AMCA plan to reduce costs and ensure benefits derived by amateurs are retained, as this approach aligns with the stated Government policy as documented above and also documented in the press release in Appendix-1.

It makes no sense whatsoever to state ACMA will ensure benefits are maintained and then to follow that commitment with a statement that ACMA find it “difficult to quantify” the benefits. With respect, after 100 years of regulated amateur radio operating in Australia and in my own case while engaging with the regulator ACMA and its predecessors for over 40 years, they do indeed know the benefits. Even if the author of the *paper* does not understand the benefits, then they should understand them before proposing to fundamentally change policy (it is not possible to ensure *benefits are maintained* if they are not known by ACMA). After four decades of ACMA interactions (including its predecessors), I have always found ACMA informed and engaging in all such matters.

In the case ACMA believe they truly do not understand the benefits of amateur radio, then it is highly inappropriate, in any manner, to make uninformed policy changes that impact a 15,000 strong national radio community whom understand such benefits intimately. Such a position is not reasonable and cannot meet the stated goal that ACMA will ensue amateur apparatus benefits are indeed maintained.

Recommendation #7: That ACMA formally identify and document the benefits of amateur radio so ACMA are informed as to how to deliver them efficiently (cost) and maintain them (services utility) under any proposal to change policy.

4.2 Apparatus licence is an Asset

To further outline the current legislated benefits for amateur radio and other current apparatus licence, the following important benefits are in place under policy:

The Radio Communications Act 1992, Section 106A makes it explicit that an apparatus licence is an acquisition of an asset and conduct. The act states;

“(1) For the purposes of the provisions of the Competition and Consumer Act 2010 mentioned in subsection (2), the issue of an apparatus licence to a person is taken to be:

- (a) an acquisition by the person of an asset of another person; and
- (b) conduct engaged in by the person.”

This is a very important provision and an explicit benefit of the amateur apparatus licence issuance. Each and every amateur holds an asset by law. The proposed class licence provides no such benefit and the class licence does not, in any way, allow an acquisition of an asset by an amateur radio licence holder.

By ACMA extinguishing the current apparatus licence and also revoking the current amateur LCD, they do indeed remove a legislative and important amateur benefit, which is the current ownership of an asset, which is currently held by all amateurs by legal right. This is in direct conflict to AMCA’s stated aim to ensure all benefits are indeed maintained.

Further, by removal of the owned asset of amateurs, by extinguishing the apparatus licence currently held, it triggers the further removal of the ACCC, Competition and Consumer Act 2010, provisions under Section (50), Prohibition of acquisitions that would result in a substantial lessening of competition in the telecommunication and spectrum industry.

To be clear, ACMA are removing the currently held right to ACCC oversight for decisions that may substantially lessen competition by decisions made that are not in the amateur radio community nor the national interest. At a minimum, this provision allows for an independent review.

Finally, and similar to the last point, amateur apparatus licence holders are also further protected under the Competition and Consumer Act 2010, where it states “Section 81 Divestiture where merger contravenes section 50 or 50A (1) The Court may, on the application of the Commission or any other person, if it finds, or has in another proceeding instituted under this Part found, that a person has contravened Section 50, by order, give directions for the purpose of securing the disposal by the person of all or any of the shares or assets acquired in contravention of that section.”

In this section “or any other person” including any of the 15,000 amateur community can make application to the Commission. The removal of the apparatus licence will remove this protection benefit.

It is clear ACMA will dispose/cancel/revoke all of the current 15,000 amateur apparatus licences and replace them with a class license, with no asset acquired whatsoever and no industry level protection from Competition and Consumer Act 2010 provisions whatsoever.

It is not consistent to propose such a change while stating ACMA will ensure benefits will be maintained. The very proposal extinguishes the benefit of the currently held asset, removed the current Competition and Consumer Act protections and the recourse of an independent review.

ACMA state that “Option C is the ACMA’s preferred approach.” (paper, P11). It further states that the changes will “Revoke the Amateur LCD” (paper, P12).

Recommendation #8: That the ACMA will not extinguish the legal right of amateurs including their current asset defined under S106A of The Radio Communications Act 1992 and also defined under Competition and Consumer Act 2010.

As, to do so without full and open disclosure is arguably misleading and unconscionable conduct.

4.3 Register and known Citizens Band issues

Under Part 3.5 of The Radio Communications Act 1992, ACMA must hold a register of all licences.

Under the specific provisions of the apparatus licence that is in effect today for all amateurs, the Radio Communications Act 1992 states “147 Contents of the Register—apparatus licences

(02) The Register is to contain the following information for each apparatus licence:
(02) the licensee’s name and postal address;
(b) the date of issue and date of expiry of the licence;
I such details as the ACMA determines, in writing, about the conditions of apparatus licences;
(d) such details as the ACMA determines, in writing, about authorisations by licensees for other persons to operate radiocommunications devices under apparatus licences;”

This provision binds ACMA to hold a formal register including name and address, issue date and expiry and conditions and authorisation provisions of the licence.

The Radio Communications Act 1992 states that “149 Contents of the Register—class licences (1) The Register is to contain, for each class licence, such details as the ACMA determines, in writing, about class licences.

There is a distinct difference in the proposed class licence. ACMA by moving from an apparatus licence to a class licence for amateurs, removes the obligation to hold licensees name or address or issue date or expiry date. This is entirely optional.

In the case ACMA by focusing on “removing costs” decide to use S149 (1) without holding amateur details whatsoever) which is valid under the legislation), then the link between the regulator (ACMA) and the amateur radio operator is almost entirely severed along with all the protections.

And the protections for such basic benefits include the ability for the register to be publicly inspected to be correct under Section 151, the ability to identify people whom may be

“rogue” individuals that operate and cause interference and have this reported for warnings and or protections under Section 193 and 197.

The current Citizens Band (HF – 26.965 MHz to 27.405 MHz (inclusive) runs on a largely deregulated class licence system. It displays unregulated rampant abuse, swearing, unprofessional standards and operators whom indeed are not monitored or held to account by the regulator (or anyone for that matter). When was the last time that ACMA listened the Citizens Band activity in the past 2 years to see how the deregulated class licence works in practice? It is indeed sobering.

Amateur radio can never be placed in the position that deregulation in fact means no regulation, no protection, no accountability, like the Citizens Band. The very protections afforded by the many Acts protecting the amateur radio apparatus licence have valid merit and were designed to keep high standards, accountability, responsibility and need to remain where they do indeed protect licence holders and the community.

Too much de-regulation increases the risk of interference and lowering standards required to keep amateur radio professional and a breaking up of the necessary systems that sit outside the ACMA that are staffed by countless committed volunteers. Too little deregulation means higher costs and often higher bureaucracy.

There is a balance required and this can be achieved by good policy reform.

Recommendation #9: That the ACMA empower the amateur community to aide in the reduction of interference as well as keeping apparatus licences so the provision and protection of the act is enforceable.

Recommendation #10: That the ACMA explicitly reject the Citizens Band model and its known issues be used for amateur radio spectrum de-regulation.

4.4 Moving to 5-year Apparatus Licences

The Modernisation Act allows for licences to be established from 5-20 years, as stated by ACMA (paper, p12). ACMA state that “While the ACMA could issue longer duration amateur licences to relieve some of the administrative burden on the ACMA and licensees, this would not significantly reduce financial costs (P12). Also, “We also note that amateur apparatus licences may currently be issued with a duration of up to 5 years, yet there is a relatively low uptake in these arrangements, signalling low interest in longer duration amateur apparatus licensing” (P13).

To be clear, The Radio Communications Act 1992, Section 103(3) allows amateur radio apparatus licences to be issued for up to 5 years today, I understand this is also being extended further. The ACMA link between 5-year take-up rates today does not factor in the important Government policy reform.

The ACMA statement is indeed misleading. As stated, ACMA can issue licences for 5 years (or more). If all amateur licences are issued for 5 years for the same cost as the current one-year licence, then ACMA will reduce the cost burden of renewals every year by around 80%.

To be clear, for the same cost at 2021, ACMA will conduct only 20% of the work. In fact, ACMA could reduce resources and bank the saving, however that is not a topic that will be discussed here. Further and in line with the stated Government policy of reduced costs and more simplification/harmonisation, that all amateur licences, for Foundation, Standard, Advanced, Beacon and Repeater be set at a single flat monetary fee that is indexed annually. To be clear, there would be no difference in licence fee for any amateur licences which immediately reduces complexity and further saves administration costs.

These two steps alone will materially reduce costs (to be specific inbound call costs, paperwork costs, IT costs, salary costs, form production costs, mail out postage costs and follow-up costs). The savings to ACMA would be immediate and also have ongoing annual savings.

A policy change of this nature benefits ACMA immediately, meets Government policy and benefits amateurs each and every year. It would be welcomed.

Recommendation #11: That ACMA make all amateur licences the one uniform cost (being the current 2021 annual fee of a Standard Licence), with the cost covering a 5-year licence (with no annual renewal). Every amateur licence would be issued for 5 years and only be renewed at the end of 5 years. The cost of a licence shall be indexed annually at CPI, but only charged once each 5 years.

It is understood the costs of the ACMA managing the admin of the amateur licences far exceeds the revenue generated from such licences.

4.5 Deregulation / Self-Regulation

It is unclear why ACMA, in its published view of adhering to the Government deregulation agenda decided to remove the WIA proven national deregulated training and education and replace it with a Government run institution (UTAS/AMC) that indeed produced extremely poor results (moving from one government body to another). The minister stated “deregulation is not about weakening, taking away or running amok.” But in fact, this is exactly what happened, ACMA re-regulated a deregulated national training capability.

ACMA took a process and re-regulated it, centralised it, adding shocking delays and damaged an effective national state wide and deregulated capability. ACMA removed the self-regulation that had been working well to date.

It makes little sense to make a decision to re-regulate (via AMC training) and then to argue to de-regulation on a matter such as callsigns. At face value, it appears ACMA wants to remove all engagement with its Radiocommunication Act major statutory obligations for amateur apparatus licences (step #1, remove all training (outsource/re-regulate), step #2, remove all call sign management, step #3, remove any material recourse to ACMA by changing from an apparatus to a class licence. This indeed would be a scandal of significant proportion. It indeed would be contrary to the Government mandate and if the voice of the 15,000 strong amateur community was not heard on this matter, it would raise serious questions of integrity.

4.6 Greater Self-Regulation

Indeed, greater self-regulation aids the appropriate balance between regulation and empowerment. For this reason, in section 2.0 above, the issues were raised with the fact the ACMA did not deregulate and cause loss of service, loss of industry capability and loss of the ability to self-regulate. This can and should change.

Self-regulation can be enhanced at four levels, namely:

1. For basic administrative services;
2. For codes of conduct;
3. For training services;
4. For simple compliance.

Self-regulation should never be for breaches of law, for legal enforcement and for impacts to commercial and Government spectrum management (albeit there may be cases in fact where the amateur community can aide in identifying issues and even recommending actions based on pr forma resolution approaches; those that remove admin costs from the ACMA).

Briefly looking at these areas.

4.6.1 Basic Admin

It is not uncommon for a person to change address or change contact details. It makes no sense for a regulator to have this cost when efficiency is important. This process can be (via legal delegation) be given to all of (a) WIA, (b) ARNSW, (c) AMC, (d) Registered Radio clubs to update on a timely basis on and for the ACMA. In the case the ACMA choose centralised groups like the WIA or AMC, a fee that is lower than the current cost to serve would be provided to the service provider.

Recommendation #12: That ACMA by instrument and an appropriate fee empower WIA and AMC and registered Radio Clubs to change address and contact details for any amateur licence.

Recommendation #13: That ACMA stop sending (costly) annual reminder notices by mail and move to email under a delegated partner like WIA or AMC.

4.6.2 Codes of Conduct

The ACMA by instrument can empower one national body, being the nationally WIA to establish and keep updated a national code of conduct. The WIA by instrument can communicate with all interested bodies on and behalf of the ACMA. This lowers ACMA costs and empowers the radio community. It would be assumed this service would like be done at n costs to ACMA and remove the burden of ongoing industry engagement on this matter.

4.6.3 Training

This matter has been discussed in section 2.0 above and recommendations have been made above.

4.6.4 Simple compliance

Simple compliance consists of letters or warnings or other pre-defined-form approaches when interference may occur. For the 12 months following this reform process, the WIA may provide to ACMA standard letter that by instrument any representative radio bay can issues to advise of interference. This is in all parties' interests. The form letters would advise of interference and present ways to consider resolution or a list of providers to aide resolution. It would not be legally binding and bring attention to the issues. Often, amateurs can help residences to eliminate such interference but some are beyond the amateur skillset. For example, power line interference can cause AM Broadcast band interference, Mobile phone interference and amateur inference together. In the first stage, the letters would show how to start a process to resolve the matter and providers that can help. This approach can reduce calls to the regulator (i.e., lower admin costs) and aide reduced spectrum interference.

Recommendation #14: That ACMA by instrument empower WIA and AMC and registered Radio Clubs to use a set of pre-defined-forms that can be sent to residences that are known to cause interference.

4.7 Call Signs

The approach proposed by ACMA to issue / assign licences by a third party, is inconsistent with the provisions of the Radio Communications Act. Especially with a class licence that removes explicit and broader legal protections (as discussed).

In the case that the ACMA delegate the callsign issuance to WIA, AMC or other, then this would only be an option if both apparatus licence and the matters in this paper are aligned.

5.0 Conclusions

The ACMA proposal paper:

- Is silent on critical issues that are raised in this paper.
- The proposal conflicts with Government policy.
- The recommended strategy Option-C should be rejected.
- The 14 recommendations in this paper can both deliver BOTH government policy AND benefits to Amateurs.
- A range of actions in this paper can be put in place withing 90 days with immediate benefits to lowering ACMA costs.
- The ACMA is compelled by Government to follow policy that is *good* policy;
- The ACMA is compelled to listen to constructive feedback by law;
- The ACMA is compelled to deliver services that indeed are “ensuring the benefits derived by amateurs from the activity are retained” (ACMA’s own paper). This is not the case with the stated policy proposal paper terms.

I would request this paper be considered on the facts contained herein.

Yours sincerely,

Matthew Ayres (MBA)

Appendix-A:

The Morrison Government's Deregulation Agenda

Release Date

02 October 2020

Speech

Address to the Business Council of Australia, Sydney NSW

In his speech to CEDA in June, the Prime Minister noted the importance of deregulation in our JobMaker plan for economic recovery.

To be clear, deregulation isn't about getting rid of all regulation. It's about getting rid of unnecessary, disproportionate, and inefficiently implemented regulation.

It's about the ease of doing business.

Well designed, efficiently implemented regulation has always had a place in Australia.

It is essential to good government, a safe community and a growing economy.

It secures important values such as competitive markets, safe communities and a healthy environment.

Good regulation is critical to making Australia one of the best countries in the world to live, and ensuring Australia has a well-functioning economy, society, environment, and democracy.

Bad regulation is a 'Job-Killer' with no redeeming features.

It inhibits consumer choice, business innovation and investment, and jobs growth.

'Bad regulation' – that is regulation which is unnecessary, poorly designed or implemented:

- imposes costs in excess of any benefits
- inhibits business investment and the creation of jobs
- is a brake on productivity, undermining our prosperity

This occurs if regulation is:

- duplicative, requiring businesses to provide similar information to multiple regulators;
- hard to find or understand
- results in unnecessarily inconsistent requirements across or within jurisdictions
- slow and costly to navigate, or,
- requires paper-based forms or outdated technology to comply

That's why I've focused this Government's renewed Deregulation Agenda on ensuring regulations are fit-for-purpose.

In the second half of last year the Prime Minister asked me, as his Assistant Minister, to work closely with the Treasurer, Josh Frydenberg, in leading a whole of government approach to deregulation – to help release the “animal spirits” in the economy.

Initially I spent a fair bit of time listening and thinking about to how progress a durable deregulation agenda.

The feedback that I received from business, and I thank the Business Council of Australia for your engagement and input, is that our approach had to be practical not ideological, we had to embrace technology and we needed to focus on the ease of regulatory compliance.

I also thank Nev Power and the Commissioners of the NCCC for their invaluable contribution.

As you know my long-held view is that our starting position should always be not to regulate.

Last year I spoke publicly about my frustration when the community demands that action be taken by government because business has acted improperly, unethically or illegally.

When business fails to provide services or products in a way that meets community expectations, the community looks to government to regulate. This often results in greater costs to business and consumers, who also have less choice.

And that’s why my main message to business and industry remains that you are vitally responsible for the regulatory environment you operate in.

With that out of my system, the approach that I take is that, where regulation is required, it must be fit for purpose and lightest touch.

The objective that any regulation seeks must be achieved in the most effective and efficient way, in a way that’s easily understood, cost effective and timely.

This practical approach to solving problems is a feature of the Morrison Government.

For nearly three decades before COVID, Australia’s economy experienced sustained growth on the back of microeconomic reforms, including deregulation.

But Australia is now facing a COVID economic downturn. New private business investment fell by 3.5 per cent in the quarter to be 5.5 per cent lower through the year. Average annual productivity growth has also been slowing.

It is now more important than ever to ensure our regulatory settings are the best they can be.

Australia must continue pursuing policy settings that boost productivity and competitiveness, support well-functioning markets, and support business investment, job creation, and growth, if our living standards are to be maintained and improved.

This is why deregulation matters and is one of the central pillars of the Government’s JobMaker plan for economic recovery.

Stewardship approach

Regulation is often seen as a ‘set and forget’ exercise – where once enacted, rules and processes are rarely reviewed.

However a series of reviews, both in Australia, such as the Greiner Review into NSW’s regulatory System, and internationally have stressed the importance of a stewardship approach to regulatory excellence.

Using this approach, Ministers, Secretaries, and agency heads are ultimately the stewards of the regulations and regulatory approaches that fall under their authority. They are responsible for ensuring these are fit-for-purpose and light touch.

The stewardship approach replicates best practice in business management by ensuring line accountabilities and performance expectations are clear and are attributed to driving improved outcomes.

And our Productivity Commission has echoed this, noting that any regulation reform agenda needs to be driven by strong senior leadership.

Over the last year I have begun to embed this stewardship approach in our regulatory policy.

We’re providing strong leadership, using Cabinet and the Secretaries Board – the equivalent to a CEO forum for our public service leadership – to identify reform opportunities.

When I was establishing the Deregulation Taskforce I was worried that a view might develop that deregulation was being done by the Taskforce and that it was business as usual everywhere else across the Public Service.

Without fully realising it at the time, the establishment of the Secretaries Board process was the first step in the implementation of a stewardship approach.

Every six months secretaries report to the Prime Minister and I through the Secretaries Board on progress with deregulation and identifying deregulation opportunities in their portfolio.

It’s unusual for a Minister, let alone an Assistant Minister, to regularly present to the Secretaries Board on the Government’s expectations as I have done.

This is bearing fruit.

Already, Commonwealth Secretaries have exhibited enthusiasm to jump on the ‘deregulation bus’ –by developing initiatives like those I will announce shortly.

I want to get to the point where the Commonwealth public service leadership drive their own deregulation buses within their portfolios, to:

- remove regulation that is no longer necessary;
- streamline regulatory processes across jurisdictions, thereby eliminating duplication;
- and,

- drive, where appropriate, the harmonisation of regulation between different parts of the Commonwealth and between the Commonwealth and other jurisdictions, domestically and overseas.

When we've achieved this cultural change, we'll know our 'stewardship' approach has really taken root.

Improving Regulator Performance

But even regulation which is fit for purpose can be undone by poor implementation or culture.

In his June CEDA State of the Nation Conference speech, the Prime Minister noted that the Government's focus applies:

"...as much to the culture of regulators as it does to the content of regulations. I'm sure anyone in business would understand that point. This crisis has shown what can be achieved when regulators are pragmatic and responsive, solving problems without compromising safeguards."

In many cases, regulators responded to the economic crisis brought on by COVID-19 and proactively engaged with their stakeholders to make adjustments that reduced the impact of the crisis on business operations.

We will draw on the lessons learned during COVID where regulators were responsive and pragmatic in delivering solutions, while retaining important safeguards.

Regulators across the Government face varying issues and their stakeholders can be quite different. Nevertheless, there are a number of common issues regardless of the complexity of the regulatory framework or the stakeholder group.

These include ensuring that their interactions with the community they regulate are clear and that they assist with compliance where appropriate.

When I examined this area another thing I found was that there wasn't a consistent approach across Government to setting expectations for regulators.

So today I announce a new regulator performance role will be established within the Department of Prime Minister and Cabinet (PM&C).

PM&C will use its convening and coordinating functions to work with Ministers and their agencies, to lift and lock in regulator performance across the board.

Placing this regulator performance policy function at the centre of Government will increase accountability, promote best practice, build professionalism of regulators and drive cultural change.

This isn't about being a 'regulator of regulators'.

Rather it is about more systematic expectation setting, reporting, monitoring and promoting a culture of regulator excellence across the Commonwealth.

It is about better coordination and data sharing, more rational and ultimately effective, risk based compliance monitoring, and footprint mapping with a view to possible streamlining.

It's about measuring, benchmarking and evaluating regulator performance, and streamlining and consolidating performance reporting at a whole-of-Government level, noting that integration of the Regulator Performance Framework into the PGPA Act – which will ensure the performance of all regulators is subject to the scrutiny by Parliament and the ANAO – is already underway.

It's also about providing forums for regulators to learn and share best practice, including new or agile regulatory approaches, developing approaches for professional development.

Today I also announce that PM&C will lead a training pilot, with the Australian Public Service Commission and the Department of Agriculture, Water, and the Environment, to lift the performance of agricultural export regulators.

This measure will lay the foundation for regulator upskilling and training across the Commonwealth.

Together, our stewardship approach, PM&C's new role in lifting regulator performance and my complementary work with the Australian Public Service Commission will operate together to improve regulator culture and client focus.

While less immediately tangible, I feel it's this measure which has the potential to deliver the most in the medium to longer term.

The Office of Best Practice Regulation

Before I come to the work we are doing to deal with the existing stock of regulation I should first outline changes we have implemented to deal with the flow of Regulation.

The Office of Best Practice Regulation oversees the flow of regulation.

It is a truism that good policy is good politics.

OBPR's job is to analyse proposed regulations before they are enacted and make sure the information is available to decision makers on its impacts.

Earlier this year the Government issued a revised Guide to Regulatory Impact Analysis.

We've made sure that Regulation Impact Statements are proportionate to the magnitude of the problem under consideration.

Independent Reviews, which can substitute for a RIS, now need to be relevant to the recommended policy option.

And the Government now expects policy makers to aim to prepare RISs that are assessed as exemplary.

When introducing new regulation one must always look at what regulation can be removed, so one housekeeping change I made was to reintroduce a requirement for agencies proposing new policies to identify offsets, and if unable to find any, to explain what efforts they undertook to find them.

The Deregulation Taskforce

When the Prime Minister asked me to lead the Government's Deregulation Agenda, he asked me to lead a new Deregulation Taskforce.

The Deregulation Taskforce concentrates on surgical investigations of particular problem regulation areas.

It does this by:

- working with business to identify regulations and processes that impose the largest cost on the economy;
- getting into businesses' shoes, and onto the factory floor to better understand how regulations affect business; and
- then working with business and agencies across all relevant levels of government to co-design and implement better, fit-for-purpose regulations.

Within its first four months in existence, the Taskforce's three 'deep dives' produced initiatives to make it easier for small businesses to put on a first employee; to commence a process leading to the modernisation of Australian business registers; to lead the way towards establishing a 21st century environmental approvals process in the first instance in partnership with WA; and to begin establishment of a modern export documentation system, a new trade information service and to better leverage the Trusted Trader Program.

During 2020 the Deregulation Taskforce has been deployed, like so many other parts of the Australian Public Service, to facilitate both bushfire and COVID-19 crisis responses.

COVID recovery has very much been the rationale behind the Taskforce's current 'deep dives' – technology neutral business communications and occupational mobility.

The need for trades and occupations to follow or perform work across borders – necessary for both bushfire and COVID recovery – has prompted the Taskforce's Occupational Mobility work stream.

Meanwhile social distancing and movement restrictions have accelerated demands for business to be conducted using 21st century technology, rather than be tied to physical means of meeting and communication.

This work on Modernising Business Communications has sparked enormous interest, with detailed input from banks, insurers, legal firms, corporate governance specialists and peak business bodies.

In June, National Cabinet embraced Deregulation as a key priority area to support economic recovery – with a deregulation agenda to be progressed by the Council on Federal Financial Relations (CFFR).

CFFR has now committed to progressing priority reforms in both occupational mobility and modernising business communications, led by the Deregulation Taskforce, with the support of Treasury.

The Deregulation Taskforce has now moved to the Department of Prime Minister and Cabinet so it is co-located with and tightly integrated to the rest of our whole-of-government deregulatory machinery.

I announce today that the budget secures additional funding so that the Deregulation Taskforce will continue and will have expanded capacity. My consultation on other potential areas for ‘deep dives’ by the Taskforce has already commenced.

While on the subject of the Deregulation Taskforce I would like to pay tribute to Mark Cully, who has led it for the last year and welcome on board Jason McDonald who will take over after the Budget.

Deregulation measures

Recently the Taskforce has assisted me, in collaboration with agencies and their Ministers, to assemble a Deregulation Package for this Budget. This work has been across government.

The leadership of the Prime Minister and the Treasurer, and the Secretaries board processes, have ensured that deregulation measures are key and central to this Budget and our JobMaker plan.

Already we have announced measures that have real and tangible deregulatory elements that support our economic recovery plan, including:

- investing almost \$800 million to enable businesses to take advantage of digital technologies to grow their business and create jobs
- undertaking significant reforms to reposition our insolvency system to reduce costs for small business and reduce the time they spend on the insolvency process. This will help more small businesses to restructure and survive the crisis.
- Simplifying access to credit for consumers and small businesses, reducing the cost and time it takes them to access credit, which will be particularly important as we recovery from the crisis.

A number of other deregulatory measures will be announced as we get closer to Budget and on Budget night.

Today, I announce some additional important measures as part of our deregulation agenda:

- Saving time and money for almost 8,000 businesses as well as tens of thousands of producers, by ensuring streamlined agricultural levies legislation is delivered on time. This is classic piece of legislative simplification which deserves prioritisation.

- Saving Australian businesses an estimated \$100 million in transaction costs by 2030, while reducing registration timeframes by streamlining voluntary private sector action to support emissions reductions – an important complement to our wider emissions reduction policy.
- Reducing the administrative burden on Australian medicines and medical devices businesses by modernising business systems and joining up services in the Therapeutic Goods Administration, saving medical businesses over \$2 million per annum, and ensuring Australians have the quickest possible access to medicines and medical technologies.
As an example, sponsors of prescription medicines submitting adverse drug reaction reports currently have to export data to a PDF and email it to the TGA. The TGA, which receives 15,000 such reports per year, must then send an acknowledgement with a reference number to the sponsor that the sponsor must then record in their database. Sponsors will now be able to use an electronic database with automatic data transfer – saving them up to 15 minutes per report.
- Streamlining early childhood education and care approval processes, saving 5,100 hours per year for prospective applicants for the Commonwealth’s Child Care Subsidy – a reduction of 75 per cent on current processing times.
Currently, child care providers who receive the Child Care Subsidy must be approved under both Commonwealth and state government law. From July 2023 new child care service applicants will only have to lodge one application, improving the ability of state and Commonwealth authorities to monitor child care compliance and fraud in the sector.
- Working with businesses to identify opportunities to streamline business reporting to the ABS, building on the success of Single Touch Payroll data, while guaranteeing high-quality statistics – potentially saving Australian business at least 50,000 hours per year.
- Creating new opportunities for over 1,000 course providers and up to 450,000 foreign students by removing barriers to international students seeking to undertake supplementary and vocational courses, such as first-aid and responsible service of alcohol qualifications.

They are just a small part of a much bigger regulatory reform picture across the whole of government. My colleagues and I have been advancing several large-scale reforms in areas yet to be announced.

National Cabinet

I would like to reflect on the National Cabinet, and its successes and opportunities.

Born out of necessity in response to COVID-19, National Cabinet has been the single biggest piece of deregulation since the creation of COAG in 1992.

The ‘cut through’ achieved by having a National Cabinet of premiers and chief ministers as willing partners with the Commonwealth has given policy development and implementation an extraordinary impetus.

This ‘cut through’ is the antithesis to COAG, where progress was based on the agreement of all states to the lowest common denominator.

Instead, with National Cabinet, reluctant states can't water down agreements. Rather, they can sit some issues out, while those States who embrace reform demonstrate the case for others to follow.

National Cabinet provides an opportunity to turbo-charge competitive federalism, where sovereign state governments remain accountable to their citizens.

Significantly, in June this year, National Cabinet embraced deregulation as a key priority to support economic recovery, with a deregulation agenda to be progressed by CFFR.

One area where National Cabinet has taken a leading role is in the reduction of duplication of processes, and bringing job-creating projects to market faster, whilst ensuring continued high standards of environmental protection.

On 24 July, all states at the National Cabinet agreed to move to single-touch environmental approvals.

National Cabinet also agreed to simultaneously develop formal national standards through further public consultation.

At his press conference after National Cabinet the Prime Minister said this:

"I had hoped to have a group of (states as) first movers, and they were all first movers."

"...this process will enable standards to be upheld, but (will) ensure process doesn't destroy projects."

"...I'm not surprised that the states and territories would be so enthusiastic and supportive of it, because they want jobs and they want to protect the environment, just like I do."

"And so, the next phase is that we have to move to put interim standards in place. We have got to move to put bilateral agreements and so that work starts now. It is a green light."

Clearly our priority is to maintain strong environmental protections, whilst at the same time, making processes more efficient and reducing duplication.

The framework for bilateral assessments and bilateral approval agreements has been in place since the inception of the EPBC Act, and their use has been recommended by both the ten year Hawke review, and the more recent Samuel review.

Professor Samuel in his interim report argued strongly in favour of devolving environmental approvals to states, underpinned by national environmental standards.

And Professor Samuel himself said:

"Under the current settings, devolution is inherently fragile and amendments to the EPBC Act are required to make them stable and to work efficiently in practice."

Before the Senate, right now, is the Environment Protection and Biodiversity Conservation Amendment (Streamlining Environmental Approvals) Bill 2020. Not only will its passage

give effect to the Graeme Samuel's interim report, it will also give effect to the will of the National Cabinet.

The essential minor and technical improvements within this Bill provide legal certainty for proponents and ensure the efficient operation of agreements. These amendments need to be passed before we finalise any bilateral agreements. Doing otherwise would leave any decisions taken under the agreement open to legal challenge on immaterial grounds, adding cost and creating uncertainty for project proponents.

This is a real test for the Senate and the Australian Labor Party.

You might have heard some arguments claiming that the position of the National Cabinet and the Morrison Government actions are inconsistent with Graeme Samuel's interim review.

Let me quote directly from Professor Samuel:

"Immediate steps to start reform should be taken, focusing on:

- reducing points of clear duplication, inconsistencies, gaps and conflicts in the EPBC Act*
- improving the settings for devolved decision-making, including issuing Interim National Environmental Standards to provide confidence that outcomes will be delivered'*

And again:

"Interim Standards are recommended as a first step, to facilitate rapid reform and streamlining."

And in Professor Samuel's own press release, he said:

"The development of National Environment Standards should be a priority reform measure. Interim Standards could be developed immediately, followed by an iterative development process as more sophisticated data becomes accessible."

This is the approach the Government is committed to. This is the approach the National Cabinet is committed to.

But this is a process which is also highly deregulatory, can lift the quality of decision making, processes and standards, even outside the jurisdiction of the Commonwealth.

This is already happening in WA, where their Environmental Protection Act is before their Parliament, and is being amended to lift it to a point where it can be accredited by the Commonwealth.

Last year through MYEFO the Government approved a Deregulation Taskforce proposal to build a 21st century digital environmental approvals process, consisting of a new single online portal, an end to end workflow system and a biodiversity database to store and share information – partnering with WA as a first step toward a consistent nationwide process.

This will support robust environmental assessments and better, quicker decision making.

So here again, deregulation is not about weakening, taking away or running amok.

Predictably those on the left of Australia politics equate any deregulation with ‘open slather’ or ‘letting the market rip’.

You expect the Australian Greens to misrepresent deregulation as nothing but “neoliberal ideology”.

But you would have thought that the party of Hawke and Keating, and more recently Tanner and Emerson, would understand and support micro-economic reform in this area.

The Rudd Government saw deregulation as an extension of National Competition Policy and through COAG it developed a reform program in 27 areas of business regulation.

But nowadays, if Labor mentions deregulation at all, it’s pejoratively.

In response to a 2016 *Quarterly* Essay, Jim Chalmers explicitly rejected the continued relevance of Hawke-Keating era deregulation reform.

And lately the Opposition Leader equates deregulation with “*right wing ideology*” and “*the law of the jungle*”.

Compared to the McGowan state government with Streamline WA, federal Labor has regressed to year zero.

Labor should return to the path of Hawke, Keating, Emerson and Tanner and assist the Government to deliver practical deregulation which preserves protections while making it easier to do business and create employment.

In simple terms, if you’re not for our deregulation agenda, then you’re not for jobs.

Conclusion

The levers and the architecture we’ve established and we’re establishing at the centre of government can help departments and agencies bring a whole-of-government and coordinated approach to deregulation.

Combined, the Secretaries Board process, the Deregulation Taskforce and National Cabinet and CFFR are the vehicles which Ministers and their agencies can use to streamline **their stock** of regulation.

The Office of Best Practice Regulation ensures **their flow** of regulation is lightest touch.

While PM&C will now support Ministers and their agencies to **improve regulator culture**.

This lean, but multifaceted architecture will make it easier for business, while fulfilling community expectations of providing proper safeguards.

The achievements of the Deregulation Taskforce and Secretaries Board to date justify this investment of resources.

Importantly, deregulation agendas must not rise and fall. They must remain embedded in government. It is like painting the harbour bridge, the work will never be completed, but it must never be paused.

We must continue to ensure our regulatory systems are fit-for-purpose.

We must continue to remove outdated regulation that no longer serves a discernible public purpose.

We must ensure regulations are administered so as to minimise the compliance costs for business.

Getting it right has never been so important. Thank you.

Appendix-B: Acts / Papers Considered in this document

- a. Radiocommunications Act 1992**
- b. Competition and Consumer Act 2010**
- c. Radiocommunications Licence Conditions (Amateur Licence) Determination 2015**

Appendix-C: Definitions of Industry Bodies

a. WIA – Wireless Institute of Australia

The WIA is the national; body representing Amateur Radio in Australia.

The origins of the WIA date back to 1910, where on the 11 March 1910 a meeting of like-minded radio experimenters met at the Hotel Australia in Martin Place Sydney forming the very first body to represent interests of wireless experimenters to government. Other, state based, organisations followed suit and a federation with each of the state organisations was later established.

b. ARNSW – Amateur Radio NSW

Originally formed in 1910 as *The Wireless Institute of New South Wales*, our organisation is one of the oldest radio societies in the world.

The role of ARNSW is that of an organisation with a diverse membership, supporting radio activity of its members, state wide. Individuals may be members of either or both organisations; many of our current members are also members of WIA as well as local clubs.

c. Amateur Radio Registered Clubs

There are over 30 Registered Amateur Radio Clubs' operating in most states of Australia.