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**From:** Ian VK3ST <ian@ian-foster.com>  
**Sent:** Wednesday, 10 February 2021 11:25 AM  
**To:** SLPSConsultations  
**Subject:** Submission re consultation paper

Here are my comments for consideration re the ACMA discussion paper.

Preamble:

In the past when the ranks of active radio amateurs seemed to be aging and in decline, there was a push for a lower level entry into the hobby of Amateur radio.

With the then WIA pushing firmly, the Novice class of license was created and this in turn brought in a number of new operators who in the most part followed the spirit of the proposal and used that license with limited power and frequency allocations to use it as a learning process and a stepping stone to either of the next two grades of license then available which were AOLCP or AOCP.

In the case of the AOCP, proficiency in Morse code was still required at a then level of 10WPM which previously years before was 15WPM.

Currently the ACMA seem to be unwilling to support legitimate complaints re intrusions into Amateur Radio allocated frequencies and fall back on the so called "Self-Regulation" of our hobby.

From a financial point of view, the ACMA receives only and almost insignificant amount of revenue from the licensing process of Amateur radio and following this it seems to allocate a similarly low level of support despite expectations of support that in years past was always provided.

From a cynical point of view, I believe that the ACMA is in a position of abrogating its responsibility to paid users of radio spectrum and would rather divorce itself from any involvement in low income streams from small specialist user groups.

In so far as the options are concerned, if I am to choose my preference then I will opt for option "A" as this is the closest that I see as being or requiring a level of service from a Government body that was created to regulate and control the frequency spectrums within Australia with and in full regard to the International Spectrum agreements such as via the IARU.

Self-regulation is a misnomer! Licensed operators have no legal power to act in relation to illegal operations, interference or other issues that negatively impact on the amateur service and to this end it is not unreasonable to expect that the enforcing body would act when presented with sufficient evidence requiring action to resolve the issue through authority granted by the Radio Communication s Act.

Any dilution of support for the support and indeed protection of frequency allocations to various users must be fought against at all levels of bureaucracy and Government.

Option B seems to be step down from the first option but allowing a greater input from vested high level commercial users and will further weaken the tenuous position we as Amateur Radio operators hold on to various part of the spectrum both as sole occupiers or shared usage.

Option C will reduce the Amateur service to one of almost zero support at any level of Government even though there would still be proficiency examinations to gain a license however without the ability or willingness of the ACMA or any other organization to support or police this model, then this system spells an easy end for the hobby which so many of us have enjoyed for many years.

What seems to get lost in all arguments is the community and commercial benefit that the Amateur Radio service has provided.

A licensed amateur radio operator is not just a person holding a microphone and talking about mundane subjects.

In general amateur radio operators have through their own personal experimentation and self-education (or furthered professional education) provided many technological break throughs and innovations that have had significant positive growth and economic impact on society in general.

Many professionals employed in the electronic and allied areas, (myself included as a design engineer and manager [Radio Corporation – Special Projects Division]), carry on their own work and investigation via this hobby in their own home environments thus creating a further benefit for their respective industries – an unpaid and incredibly valued resource!

While I supported somewhat reluctantly the process of Foundation licensing as being set at a level too low and without time limits to move to a higher level of license, I accept that this process in general seems to be working in many cases as intended.

To allow an alternative where an even lower level of entry for an Amateur Radio operators license will only open the flood gates to another tier of the CB band that could not and would not under the proposals, be able to be policed or controlled. Once again, self-regulation is a toothless tiger!

Amateur radio is a facility that allows Self Education and development in the fields of electronics and communications. Let us not forget that over the many years there has been significant community gains from those who have moved from Amateur Radio ranks into professional fields or even in the reverse continuing their own personal development and education.

Being an Amateur radio operator – (Operator should be replaced with licensee) is much more than black box chatting and many of us who pick up a microphone less often spend considerable time in research and development and this is where the Act allows us to work and this area is one that could potentially be under threat!

To become a licensed Amateur Operator currently requires a certificate of Proficiency followed by a paid license that is current. Both are required to be an active person within this hobby and is clearly defined within the relative Acts that control our activities.

Dilution as indicated by extrapolation in option C would eventually lead to a total demise of the Amateur radio system purely from pressure of commercial needs on finitely limited space of the radio frequency spectrum.

Prior to my retirement and during my employment and appointments at UNSW as a Fellow, Researcher, Manager, Lecturer and PhD mentor, my AOCP was a well-regarded and respected addition to my CV both here in Australian Academia and Internationally in my University conference and training visits and I would hate to see the value of this recognition diminished which is precisely what will happen should any credence be given to the Option C.

Happy to respond to any points if requested.

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