

The Manager  
Spectrum Licensing Policy Section  
A.C.M.A.  
PO Box 13112  
Law Courts  
Melbourne Vic. 8010

Dear Sir / Madam ,

Ref. ACMA Proposed changes to amateur licensing arrangements 2021

Submission for consideration ..... in support of option ( A )

In line with current government policy the ACMA has proposed to move amateur radio licensing to class licensing to reduce cost and work involved in administering the legislation , this in its self an administrative exercise to modernise and simplify the legislation, but in doing so should not change the original intent of legislation .

ITU region 3 spectrum plan allocates spectrum spaces to amateur radio as Primary and Secondary defined users , ITU article S25 RR No.5.8.28 – 31 defines the provided levels of protection provided , ACMA currently uses ITU footnotes to restrict and reduce our access to amateur allocated spectrum space .

ACMA proposed options ( B & C ) would remove the current provided protection from interference , this would appear to conflict with ITU regulations combined with the removal of mandatory operating conditions , together with the removal of monitoring of the amateur spectrum which conflicts with ACMA's statutory responsibility of spectrum management .

ACMA has not presented a constructive case to the amateur society for a change to class licensing conditions , the draft class legislation presented just does not apply to amateur radio simply by its nature of operation and structure , since amateur radio is a global society there should not be any changes of australian spectrum management that could have a impact on the rest of the world's amateurs , this would not be acceptable .

Yours sincerely ,

J.Hodkinson



Dated. 3 march 2021

Postal

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