

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

Re: Class License Proposal

Dear Manager:

Following are my comments on the proposed change in licensing of radio amateurs in Australia.

With some concerns, that could be minimised by additional communications and clarifications between the amateur community and the ACMA, I support the change to a Class licence for radio amateurs.

As background, I understand the pressure to reduce ACMA administration costs related to the amateur service. With that in mind, I suggest that the ACMA consider the following:

1. Move to a type of "industry self-regulation" similar to that established for the TV-radio industry and other industries.

Base the "self-regulation" on the participation of the WIA and local amateur radio clubs. Note that in the USA the FCC works with the ARRL in the context of a "Volunteer Monitoring Program" managed by the ARRL. The Volunteer Monitors act as the first line in identifying and documenting any non-compliance events in the amateur radio bands. If a local Volunteer Monitor is unable to correct or resolve an issue, that matter is moved up to the FCC.

I suggest the involvement of the WIA and local radio clubs in a new "self-regulation" relationship similar in structure.

This could minimise the administrative burden on the ACMA and would use "community pressure" from the local amateur radio clubs to support correction of problems.

If the problem could not be not corrected with the support of the volunteer monitor / local club, the ACMA would receive a documented "case profile" enabling the ACMA to take formal action with minimal time and cost.

2. Change to a single class of amateur radio license with all privileges to any license holder.

These days most amateurs purchase equipment so their equipment usually meets the specification in the related regulations. There is little need for a progression of learning "steps" in technical knowledge as intended by the current licence structure.

In my opinion, currently, the primary need in the licensing process is to educate potential licence holders about legal and operational compliance. This could be handled by a strong focus on legal and operational compliance in the initial testing and licencing of an amateur operator. Later this compliance can be managed through a "self-regulation" environment.

I am aware of the "I worked hard for it, why is it easier now-a-days" syndrome. My response is: That was then; this is now.

Sincerely,

L. Hower

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#### References:

##### Volunteer Monitor Program

<http://www.arrl.org/news/arrl-thanks-official-observers-as-volunteer-monitor-program-is-set-to-debut>

The ARRL and the FCC signed a *Memorandum of Understanding (MOU)* earlier this year that establishes the Volunteer Monitor program as a successor to the Official Observers. The first Volunteer Monitors should be in place and ready to begin their duties this fall. (2019)