

Pro forma submission 4 – the ACMA received 21 submissions in this form.

Notes on this pro forma submission:

- Sections in yellow highlight varied across the submissions.
- Of the 21 submissions, 4 **did not** include the phrase in green highlight.

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

**Re: Review of non-assigned amateur and outpost regulatory arrangements – consultation 01/2021**

Dear Spectrum Licensing Policy Section Manager

I thank you for the opportunity to comment on the Review of non-assigned amateur and outpost regulatory arrangements – consultation 01/2021.

I provide responses to the following issues as outlined in the consultation paper:

1. The options being considered under the review:
- Option A: keep the existing apparatus licensing arrangements and licence conditions.
  - Option B: simplify the current licensing arrangements and licence conditions by amending the amateur LCD.
  - Option C: transition to class licensing arrangements for non-assigned amateur stations. The operation of assigned amateur stations would continue to be authorised under apparatus licences.

I have concerns that the ACMA's stated purpose of "preserving the current operational utility for licensees" has not been reflected into the proposed Class Licence and that amateur radio operators will be disadvantaged in the future by moving to the Class Licence as currently proposed.

These concerns centre on:

- Needing further clarity on whether the current interference management regime will continue to be available to the amateur service under the proposed class licence. This includes the mutual resolution options for the amateur service to take steps to resolve interference complaints.
- Simplification of EMR management for the amateur service similar to the current *Radiocommunications Licence Conditions (Apparatus Licence) Determination 2015* with level 1 and level 2 compliance as defined.
- Clarification of revised callsign management regime that will be required under the proposed class licence. A publicly available register of all callsigns, callsign pool management, allocation, removal and availability is required. This is especially important for amateur service self-regulation activities.
- The current AOCP document is not sufficient evidence of a valid CEPT compliant amateur licence when travelling overseas to CEPT signatory countries and therefore under the proposed class licence there does not appear to be a CEPT compliant document available.

I am not against the introduction of an Amateur Service Class Licence however, I cannot support the one the ACMA has proposed without further clarity as outlined above. Therefore, at this time I am only able to support option A - keeping the existing apparatus licensing arrangements and licence conditions.

If the ACMA is prepared to modify the proposed class licence to address the above concerns then I would certainly be prepared to support a class licence for amateur radio in future.

2. The proposed content of the consultation draft class licence (the draft Radiocommunications (Amateur Radio Stations) Class Licence 2021).

- I support the Wireless Institute of Australia (WIA) suggestions for additions and amendments to the proposed Class Licence in relation to:
  - Callsign usage
  - Spurious Emissions Definition
  - Electromagnetic Radiation
  - Low and Medium Frequency Power Definitions and Exclusion Zone and
  - Restoration of harassment provisions

3. The development of an amateur operating procedures document to include non-binding recommendations for operation of amateur stations, removing binding conditions under options B and C.

I support the WIA developing and managing the operational guidelines outlined in the proposal. They are the IARU recognised Australian amateur radio peak body.

4. Whether a new type of accreditation should be created that allows the issue of frequency assignment certificates only for beacon or repeater licences.

If a simplified and cost effective accreditation scheme can be found then I certainly support it. I support the expansion of the role of the WIA in the frequency assignment area.

5. The qualifications that should be required from applicants for this kind of accreditation.

I support the creation of minimum qualification levels, training, syllabus development to support a revised/new accreditation scheme if it is found to be cost effective for the amateur service.

6. Any other matters that are relevant to the establishment of such an amateur accreditation arrangement.

I support the WIA view on this matter.

7. Any comments, including alternative proposals, relating to the ACMA's current policy on reciprocal arrangements for recognition of overseas qualified amateurs.

I support the simplification and continuation of the *Radiocommunications (Overseas Amateurs Visiting Australia) Class Licence 2015* and its eventual alignment and possible incorporation into an enhanced Amateur Service Class Licence.

8. Any suggestions to further reduce regulatory burden on amateur licensees.
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I support the move of the amateur service to a self-regulation model and would encourage the creation of an Amateur Code of Practice managed by the Wireless Institute of Australia.

Yours sincerely

[Name and contact details of submitter]

[date]