



**Melbourne. Electronics &  
Radio Club Inc. A0050658B**

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## **Response to Proposed ACMA fees for service 2022–23 - IFC 22/2022 on behalf of Melbourne Electronic & Radio Club Inc. A0050658B**

21-July-2022

### **Via Online submission**

Thankyou for an opportunity to comment on the ACMA's Consultation on the proposed fees for service for 2022-3

### **Background**

The Melbourne Electronic and Radio Club (MERC) is a club which primarily exists for the purpose of self-training, and technical investigations in radio communications and electronics. Our activities include:

- training of fellow enthusiasts, where club member or not, for the purposes of obtaining an Amateur Radio qualification;
- Using our Amateur radio training to promote STEM learning
- support of club members in their endeavours to improve their Radiocommunications knowledge, undertake technical projects and impart these skills to others;
- to develop shared resources such as local repeaters for the use of the club and wider amateur radio community;
- to engage with other community and service groups via the medium of Amateur Radio
- to support the WIA in its endeavours to promote and advance the Amateur Radio community

### **Issues with 'Radcom Determination'/ Cost recovery model as distributed for consultation**

Given the aims of MERC we took particular note of your proposal to increase by a significant margin the current fees to be charged for obtaining an Amateur radio license though proficiency examinations were these examinations to be conducted by the ACMA. In fact we would contend that the proposed increase in examination fees for Amateur Radio promulgated in your Radcom determination draft will in practice actually:

1. Work against current government policies that are designed to encourage STEM learning and innovation,
2. Work against community compliance with the Radiocommunications Act,
3. Fail to promote equity and
4. Fails to consider a cost recovery alternative that promotes STEM learning, innovation, legislative compliance and equity.

***Why the Draft Radcom determination for Amateur radio examination fees will work against current government policies that are designed to encourage STEM learning and innovation'***

Through documents such as Australia's national science statement<sup>(1)</sup> the Australian government has for some time articulated the importance the Australian Government places on having a strong and stable system of science and aims to engage all Australians with science; build scientific capability and skills; and to improve and enriching Australians lives through science and research. This enunciation of a series of whole-of-government principles to guide decision making combined with a strategic policy framework for science in Australia, includes a commitment to STEM skills that is revealed in programs such as the Australian Chief Scientists "STEM Everywhere" campaign and the ACMA's graduate program. These efforts are not only supported by tertiary and secondary classes that teach science but are uniquely supported by the Amateur Radio (terrestrial and satellite) Services as unlike commercial services they are according to the ITU Radio Regulations<sup>(2)</sup> "A radiocommunication service for the purpose of self-training, intercommunication and technical investigations" as such the Amateur service has always been used to allow people, especially youth a chance to explore and extend their scientific knowledge through both self learning and learning support through a range of community groups such as MERC, Scouts Australia and others. When the draft Radcom determination proposes that the cost of a Amateur Radio part examination be priced at \$264 or \$490 for a full license then this can only serve to actively reduce the ability of members of the Australian community to participate in such learning especially in relation to youth or those with limited social equity as further detailed below.

***Why the Draft Radcom determination for Amateur radio examination fees will work against community compliance with the Radiocommunications Act'***

Once the cost of completing an examination to join the Amateur service or undertake a maritime short range qualification becomes excessive we have observed that there a perception in the community that it is either not worth taking the qualification which carries with it a number of safety learnings and the number of people using a transmitting device is likely to increase.

***Why the Draft Radcom determination for Amateur radio examination fees fails to promote equity***

A 2021 study sponsored by the Australian Government via the National Centre for Student Equity in Higher Education<sup>(3)</sup> it was identified that "*Students in equity groups may be less likely to exhibit the characteristics typical of a STEM profile in early adolescence because of limited opportunities or limited exposure to the cultural and social capital required for these characteristics to develop*" in other words combating inequities in STEM education requires positive reinforcement and role models something which is difficult to achieve when the cost of qualifications such as an Amateur operators certificate of proficiency at any level is so high. Whether we are referring directly to youth who are actively learning and making decisions regarding future career objectives or those wanting to learn as an exploration of a potential future career while on a social security payment the Draft Radcom determination fails to make any allowance for these people.

***How the Draft Radcom determination for Amateur radio examinations fees fails to consider an alternative cost recovery alternative that promotes STEM learning, innovation, legislative compliance and equity.***

While the Draft Radcom Determination suggests sizable increases in examination fees of between 38% to a cost of \$490 for Standard and Advanced licenses (*Sch 1 Part 4 Table 1 (Item 4.1.1)*) and 124% to a cost of \$264 per part exam (*Part 4 Table 1 (Item 4.1.3)*) at no point in the Cost Recovery Implementation Statement have more equitable alternatives been considered.

For example the following two options who increase equity of access and better support the intent of the ITU definition of the Amateur Radio Services in relation to learning and youth access.

**Option 1.**

Define discounted exam fees for those that are under working age, unemployed , receiving a social security payment or learning as part of a community sponsored program.

**Option 2.**

Given the fact that the people being levied these examination fees are not commercial entities, nor are they able to recover any of the cost as this training is for personal education rather than direct professional outcomes any cost recovery for these examinations should apply to the Amateur service as a whole, rather than the individuals taking the examinations. This is due to the fact these examinations is how the Amateur Radio service renews itself; fuels innovation through individual investigation and STEM learnings; and provides community support whether it be in the form of emergency support by groups such as WICEN, club based educational support or direct community outreach.

As the entire Amateur Radio community is supported through the examination process it is logical that an alternative cost recovery model should be considered where the whole Amateur radio community fosters equity and STEM learning at minimal cost through an increase of license renewal fees for those in the Amateur Radio Service.

Currently all private licensees once licensed are charged \$4 plus applicable taxes to renew their a non assigned amateur radio apparatus license, if this were to be increased to \$10 plus applicable taxes this would yield an equivalent amount of revenue to what is likely to be expended by the ACMA (based on current turnover of licenses)<sup>(4)</sup> charging its proposed exam fees if it were to required to conduct examinations over a 12 month period.

Given the number of Amateur radio licensees has remained relatively constant over the past 5 years at an average 15,122<sup>(5)</sup> this is also likely to yield an equivalent amount of revenue to that collected in higher fees for a 12 month examination period. Should the ACMA however, not be required to conduct such examinations due to their current outsourcing arrangements with the AMC or another future entity, any additional funds could be applied via the contract with this 3<sup>rd</sup> party organisation to ensure the renewal of Amateur Radio in Australia by a supported examination process through reduced examination fees and equity of access that remains in reach to those who are minors or in receipt of a Commonwealth benefit.

**References**

1. Commonwealth of Australia 2017. Australia's National Science Statement ISBN: 978-1-925092-90-5.
2. ITU Radio Regulations Vol. 1 Articles. 2020 retrieved from <https://www.itu.int/pub/R-REG>
3. McMillan J, Rothman S, Buckley S, Edwards D. (2021). STEM Pathways: The impact of equity, motivation and prior achievement. Australian Council for Educational Research
4. Average number of expired licenses 2018-2022 (Spectra database).
5. Average number of licenses granted 2018-2022 (Spectra database).

Should you wish to discuss any of the above please do not hesitate to contact MERC via our email address.

Yours Sincerely,  
Neil Wilson.

Secretary Melbourne Electronics & Radio Club.