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### **Proposed changes to radiocommunications equipment regulation**

To whom it may concern

The Australian Maritime Safety Authority (AMSA) thanks the Australian Communications and Media Authority (ACMA) for this opportunity to comment on *Proposed changes to radiocommunications equipment regulation - consultation 37/2022*.

The development and implementation of radiocommunication standards for maritime radio and distress alerting devices, is critical to ensuring technical interoperability when users need it most. AMSA is committed to modernisation of the relevant technical standards, as evidenced in our leadership this year updating the AS/NZS standards for 406 MHz beacons in Australia (AS/NZS 4280.1 and 4280.2).

AMSA has provided comments against the proposals for each standard in Annex A. In general, we are of the view that the equipment rules relevant to maritime and distress alerting identified in the consultation paper remain appropriate and consistent with international regulatory regimes. AMSA makes no comments on other aspects identified in the consultation paper or draft instruments.

AMSA regulations, including the National Standard for Commercial Vessels (NSCV), refer to many of the existing standards referenced in the consultation paper. AMSA would appreciate further liaison with the ACMA so that references can be checked and corrected as required.

Please contact Stuart Shepard, Principal Advisor Maritime Communications, on [stuart.shepard@amsa.gov.au](mailto:stuart.shepard@amsa.gov.au) for further information on this submission.

Yours sincerely

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## Annex A

	ACMA radiocommunications mandatory technical standard	Industry standard(s) currently adopted	Incorporation into General Equipment Rules	Additional overseas industry standard to be adopted	Other substantive changes	AMSA comments
1	Radiocommunications (Analogue Speech (Angle Modulated) Equipment) Standard 2014	AS/NZS 4295:2015	Analogue Speech (Angle Modulated) Equipment Standard (Part 3 of Schedule 5)	ETSI EN 300 086:2016  (As per essential requirements of Directive 2014/53/EU)	N/A	No comments
2	Radiocommunications (HF CB and Handphone Equipment) Standard 2017	AS/NZS 4355:2006	HF CB and Handphone Equipment Standard (Part 4 of Schedule 5)	ETSI EN 300 433:2016  (As per essential requirements of Directive 2014/53/EU)	N/A	No comments
3	Radiocommunications (MF and HF Equipment – Land Mobile Service) Standard 2014	AS/NZS 4770:2000	MF and HF Equipment – Land Mobile Service Standard (Part 5 of Schedule 5)	N/A	N/A	No comments
4	Radiocommunications (Paging Service Equipment) Standard 2014	AS/NZS 4769.1:2000 and AS/NZS 4769.2:2000	Paging Service Equipment Standard (Part 6 of Schedule 5)	ETSI EN 300 224:2017  (As per essential requirements of Directive 2014/53/EU)	AS/NZS 4769.1:2000 and AS/NZS 4769.2:2000 have been withdrawn by Standards Australia and will not be adopted in the General Equipment Rules	No comments
5	Radiocommunications (UHF CB Radio Equipment) Standard 2011 (No. 1)	AS/NZS 4365:2011	UHF CB Radio Equipment Standard (Part 7 of Schedule 5)	N/A	N/A	No comments

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6	Radiocommunications (118MHz to 137MHz Amplitude Modulated Equipment — Aeronautical Radio Service) Standard 2012	AS/NZS 4583:2016	118 MHz to 137 MHz Amplitude Modulated Equipment – Aeronautical Radio Service Standard  (Part 8 of Schedule 5)	ETSI EN 300 676-1:2011  (As per essential requirements of Directive 2014/53/EU)	N/A	No comments

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7	Radiocommunications (406 MHz Satellite Distress Beacons) Standard 2014	AS/NZS 4280.1:2017 and AS/NZS 4280.2:2017	406 MHz Satellite Distress Beacons Standard  (Part 9 of Schedule 5)	N/A	AS/NZS 4280.1:2022 is to be adopted in the General Equipment Rules replacing the superseded 2017 version	<p>AMSA supports the adoption of AS/NZS 4280.1:2022; however, has the following comments to make on proposals in section 30 of Schedule 5, Part 9.</p> <p>We propose that Item 2, and reference to <i>Paragraph (f) of subclause 4.3.3 (Activation)</i> should refer to <i>Paragraph (e) of subclause 4.3.3 (Activation)</i>, which provides for the 406 MHz signal and message format (section 5.2 of 4280.1:2022), 121.5 MHz homing signal (section 5.5 of 4280.1:2022) and AIS locating signal (section 5.6 of 4280.1:2022). Alternatively, each of sections 5.2, 5.5 and 5.6 could be included as separate line items in the table.</p> <p>For subsection 30(3) of Schedule 5, Part 9, AMSA is unable to determine why this paragraph, and equivalent provisions, has been omitted. We note that similar text also appears in paragraph 4.3.4.2 and 4.3.4.4 of 4280.1:2022. We would appreciate further guidance on this decision.</p> <p>We note there are also two subsections 30(3) in Schedule 5, Part 9.</p> <p>Standards Australia has opened a public comment period for adopting an amendment to AS/NZS 4280.2 for a partial adoption of the RTCM 11010.3 personal locator beacon (PLB) standard. This comment period closes 17 February 2023.</p> <p>As it is anticipated that this process will be finalised in mid-2023, AMSA would support inclusion of AS/NZS 4280.2:2023 in Schedule 5, Part 9 of the amended <i>Radiocommunications Equipment (General) Rules 2021</i>.</p> <p>A review of the provisions of AS/NZS 4280.2:2023 will be required and may result in amendments to section 31 of Part 9. AMSA would appreciate being consulted on this review.</p>

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8	Radiocommunications (Devices Used in the Inshore Boating Radio Services Band) Standard 2017	AS 4376:2007	Equipment Used in the Inshore Boating Radio Services Band Standard  (Part 10 of Schedule 5)	N/A	N/A	No comments
9	Radiocommunications (MF and HF Radiotelephone Equipment – International Maritime Mobile Service) Standard 2014	AS/NZS 4582:2004	MF and HF Radiotelephone Equipment – International Maritime Service Standard  (Part 11 of Schedule 5)	ETSI EN 303 402:2017  (As per essential requirements of Directive 2014/53/EU)	AS/NZS 4582:2004 has been withdrawn by Standards Australia and will not be adopted in the General Equipment Rules	AMSA supports the adoption of ETSI EN 303 402:2017.
10	Radiocommunications (VHF Radiotelephone Equipment – Maritime Mobile Service) Standard 2018	AS/NZS ETSI EN 301 025:2018, AS/NZS ETSI EN 301 178:2018, and AS/NZS ETSI EN 302 885:2018, plus their identical ETSI EN counterparts	VHF Radiotelephone Equipment – Maritime Mobile Service Standard (Part 1, Part 2 and Part 3)  (Part 12 of Schedule 5)	N/A	The 2021 version of ETSI EN 301 025 is to be adopted in the General Equipment Rules replacing the superseded 2017 version.  An error in the mandatory technical standard which inadvertently requires compliance with Clause 8.5 (Audio frequency response) of AS/NZS ETSI 301 178 and ETSI 301 178 is to be corrected so it will now align with Directive 2014/53/EU	AMSA supports the proposed amendments to Schedule 5, Part 12—VHF Radiotelephone Equipment – Maritime Mobile Service Standard (Part 1, Part 2 and Part 3) of the amended <i>Radiocommunications Equipment (General) Rules 2021</i> .

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11	Radiocommunications (Digital Cordless Communications Devices — DECT Devices) Standard 2017	ETSI EN 301 406 V2.2.2 (2016-09)	Digital Enhanced Cordless Telecommunications Equipment Standard (Part 13 of Schedule 5)	N/A	N/A	No comments
12	Radiocommunications (Intelligent Transport Systems) Standard 2018	ETSI EN 302 571	Intelligent Transport Systems Standard (Part 14 of Schedule 5)	N/A	N/A	No comments
13	Radiocommunications (Short Range Devices) Standard 2014	AS/NZS 4268:2017, EN 300 220-1, EN 300 330, EN 300 440, EN 305 550-1 and FCC Rules Title 47 Part 15	Short Range Equipment Standard (Part 15 of Schedule 5)	N/A	N/A	No comments
14	<u>Radiocommunications (121.5 MHz and 243.0 MHz Emergency Position Indicating Radio Beacons) Standard 2014</u>	To be repealed	To be repealed	To be repealed	To be repealed	<p>Satellite detection of 121.5 and 243.0 MHz analogue emergency position indicating radio beacons (EPIRBs) ceased in 2009.</p> <p>121.5 MHz remains the international aviation distress frequency and some manufacturers are selling devices internationally, though there is no known manufacturer or supply in Australia.</p> <p>In repealing the standard, we want to ensure there is no possibility for supply of 121.5 and 243.0 MHz analogue EPIRB into the Australian market. If this can be achieved, then AMSA would support repeal of this standard.</p>