

**CLUBROOMS:**

[REDACTED]

**POSTAL ADDRESS:**

[REDACTED]

WEBSITE: [WWW.VK3FSK.ORG.AU](http://WWW.VK3FSK.ORG.AU)

29-Nov-2022

The Manager  
Spectrum Licensing Policy Section  
Australian Communications and Media Authority

**By Online submission**

Thank you for an opportunity to comment on the ACMA's Consultation Paper on 'Proposed amateur class licence and considerations for higher power operation'.

**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;
- 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 support the WIA in its endeavours to promote and advance the Amateur Radio community
- to engage with other community and service groups via the medium of Amateur Radio

It was therefore with some interest which we had read your consultation paper as the proposal to move to class licensing will potentially lower the cost to remain in the Amateur radio service but also presents challenges in demonstrating that members hold a valid Amateur Radio license to those outside of the ACMA if the proposal to no longer use the Register of Radiocommunications Licenses is adopted in its present form.

During the time available for consultation MERC conducted a series of discussions with its members and other Amateur Radio operators through a series of club meetings and on air nets.

While consensus was not achieved on all consultation questions there was significant agreement on the questions responded to below.

**Responses to Consultation Questions****Question 1** *"Do you see any reason for not extending secondary user access to the 50–52 MHz band for Standard amateurs?"*

It was universally agreed by all those we consulted with both inside and outside of our club that this should be endorsed.

**Question 2** ***“What are your views on the proposed policy on call sign transfer?”***

When considering the scenarios presented regarding the assignment of call signs most were generally agreed to be appropriate with the following exceptions:

- a) The transfer of call sign policy
- b) The number of assigned call signs policy.

When considering the number of assigned call signs we would argue that Individuals Amateur radio operators should not be able to collect call signs for the purpose of transfer at a later date for monetary gain, that is to say, while an individual amateur should be allowed to have multiple call signs, for example to reflect their location or for contest use, a general limit should be placed on the number of call signs that can be collected by an individual without a need to demonstrate the need for extra call signs to be issued. It was also believed that exploiting call signs as a product for sale between operators was generally outside the spirit of the Amateur Radio Service as a non-commercial radio service and transfers between operators should be arranged in such a way as to minimise this possibility.

**Question 3** ***“Will the proposed ‘regular check’ – to confirm whether a person is still using their call sign – be a sufficient method of ensuring there are enough call signs (in combination with other factors, for example, the high number of available call signs, deceased amateurs, most amateurs only wishing to hold one call sign)”***

We currently see no reason as to why this would not be sufficient, but would recommend a review of this under the class licencing system after a period of operation such as 3 years, to determine if this remains true

**Question 4** ***“What are the benefits or disadvantages of our proposal not to limit the number of call signs that may be assigned to a person?”***

Some concern was expressed as to the possibility that particular operators could apply for a series of vanity call signs and use this as a money making exercise whereby they request a payment before transfer is authorised. See also the response for question 2 above.

**Question 5** ***“Do you have any concerns with the other proposed call sign management arrangements? If so, what are they?”***

While the ACMA have indicated that they will the ACMA will publish a call sign assignment policy that includes information on call sign templates, ‘reserved’ call signs and other matters relating to the syntax and allocation of call signs the inferred policy described through a series of examples does not describe any additional requirements apart from the standard template requirement of residency or specific allocations for scouts and guides. Attention should be given to continue the arrangements for Special event callsign call signs and area specific call signs such as currently included for VK9 and 0. The current arrangements for VK0 and 9 callsign allocations should continue namely:

VK0 Allocation where proof of posting to an ANARE station/base/ Authorisation letter from ANARE is required.

VK9 Allocation where VK9 call signs are reserved for stations that intend to visit or live on Australian islands/external territories. For major islands with a regular air service (Lord Howe, Norfolk, Cocos-Keeling and Christmas) – an address on the island. For remote islands (Mellish Reef, Willis, etc) - authorisation letter from the authority in charge of the island.

**Question 6** ***“In the absence of amateur and station information being contained in the Register of Radiocommunications Licences, are there any amateur-operated registers or other existing voluntary registers that you would use?”***

Unfortunately, while the ACMA discussion paper highlights a number of possible uses for the Radiocommunications Act to Register Radiocommunications Licences (RRL) it fails to recognise a key use that cannot be replaced by any private database. The RRL is unique in that it is established under section 143 of the Radiocommunications Act to Register Radiocommunications Licences and acts as a public source of truth regarding such licenses. As such no private document can replace the register for the purpose of proving that a member of the Amateur Service is validly licensed either under the current system nor under the proposed changes as no license document is currently or proposed for issue to a member of the Australian Amateur Radio Service that can be verified as authentic without reference to the RRL or the ACMA directly. Even under current circumstances when an operator downloads a pdf copy of their license from the RRL this is only an intermediate step as any 3<sup>rd</sup> party such as a fellow amateur, police officer or equipment retailer can only know that the document is valid by accessing the RRL in electronic form or contacting the ACMA to validate the RRL entry.

While your discussion paper correctly points out that *“Neither the Act nor the RRL Determination states that detailed information about class licences or people operating stations under class licences should be contained in the RRL. Section 132 of the Act broadly states that class licences are to apply to ‘any person’, subject to conditions, and the Act does not cover the collection of personal information about people operating stations under class licences in order for the ACMA to manage the spectrum.”* It fails to point out the s149 of the Act allows for similar information to be collected for class licenses. In fact s149 allows the ACMA to determine what information may be included in the Register such other details about class licences as it thinks necessary or convenient for the purposes of this Act. Given this, it would be quite reasonable for the ACMA to continue to collect and publish the same information that it currently publishes for holders of an Amateur Radio apparatus license for Amateur radio class license holders after making an appropriate determination to do under s149 in line with the objects of the Act.

Given that there is an ongoing intention to issue Amateur Operators Certificates of Proficiency, issue call signs and periodically check whether a license is still required there is a significant opportunity to continue to maintain the information contained within the RRL for Amateur Radio licensees at little or no additional cost by periodically uploading the information collected through the licensing call sign allocation and call sign checking process that is being proposed.

Were the RRL not to be maintained for the Amateur Radio class license the only other simple option that may be available to verify whether a person is licensed would be to recommence issuing licenses, however, this is likely to be a more costly and less versatile process to administer.

**Question 8** ***“What are your views on the proposal to allow Advanced amateurs to apply for assigned scientific licences for certain experimentation uses, such as reflecting signals from a celestial body as well as inter-continental ionospheric and trans-equatorial propagation experiments?”***

While the ACMA’s suggestion is understandable and there was general consensus that higher power operation should be allowed in these and other circumstances the need to periodically apply for a facilitated Scientific License at high cost while a medium term option was not seen as a long term practical solution. Rather it was argued by

some that an additional license endorsement or qualification should be considered once class licensing is in place that would allow operators higher power use for such experimentation after demonstrating competence with appropriate risk management techniques and compliance with relevant safety standards