

## **PROPOSED CLASS LICENCE - ISSUES FOR COMMENT**

Views OF Gilbert Hughes VK1GH

### **Comment in order of the Consultation questions:**

1. No reason for not extending secondary access to 50-52 MHz
2. Callsign transfer – supported.
3. Regular check of Callsign use – supported.
4. No limit on number of call signs held – not supported – will lead to hoarding and ‘grey’ trading of call signs by non-Amateurs. Not in the spirit of Amateur Radio.
5. Concern that the entity that manages call signs is a not for profit and ongoing.
6. No knowledge of existing non ACMA register of call signs – some voluntary ones do exist.
7. CEPT operation – no difficulties anticipated.
8. Assigned Scientific Licences for higher power operations not supported as proposed. Far too costly on an annual basis and unnecessary provided the EMR standards are met. This proposal would limit these experiments to wealthy Amateur Operators.
9. Other high power activities – If over 1kW peak power out of transmitter special conditions needed to ensure safety and minimise possibility of interference to other services.
10. Requiring Advanced Amateurs to apply to use moderately higher power – up to a 1kW peak power on a case by case basis is a resource intensive exercise for little benefit and not required in many other administrations with this higher power limit. All Amateurs should be required to have a record of compliance with EME limits and accept responsibility for correcting any issues that arise.
11. A 1 kW peak power limit is appropriate as this is comparable with other administrations and has been shown to work well in New Zealand. It allows Australian operators to be heard in distant countries on an equal basis with other operators on the same band, a position that is denied to Australian operators at present, meaning they are often not able to be heard in distant places when other higher powered stations are. Australia is a very long way from US, Europe, Japan and Asia.
12. The higher power limit for advanced Amateurs should be available on all the HF bands and existing limits apply to other bands. The potential of interference at the VHF, UHF bands is higher and not usually required. Noting no such limit is the case in NZ, (just suggesting caution).
13. This question overthinks the issues for no benefit. Many administration, with appropriate conditions (e.g. Special condition 1-8 in the NZ General User Licence (Radio) the Class Licence that

authorises Amateur Radio in that country) avoid getting bogged down in specific examples of why an Operator wishes to use higher power. Higher power needs are a worldwide issue due to the increasing radio noise floor from the many common domestic appliances that make reception of weak HF signals often impossible, denying lower power operators the ability to communicate. An option for fully qualified operators to use powers up to 1Kw peak in common with other countries equals the playing field.

14. See 13 above. Nothing to be gained by attempting to micro manage higher power operations up to 1kW peak transmitter output by Advanced Amateurs who choose to do so from time to time. The critical issue is the correct conditions in the class licence that put the onus on the operator to resolve all interference issues themselves, and demonstrate compliance with EME/EMR standards at all times as required by the owners of every radio transmitter in Australia.

### **Other Matters**

The discussion paper high risk/low risk powers strangely refers to 10 MHz and above. There are 5 Amateur bands below 10 MHz that are not mentioned.

It needs to be noted that Amateur operators often change antennas and station layouts, unlike most non amateur transmitting sites. The cost of having an accredited EMR/EME survey each time a change was made would be prohibitive and therefore never happen.

Have a look at the New Zealand Class Licence. [Amateur Radio Operators GURL | Radio Spectrum Management New Zealand \(rsm.govt.nz\)](https://www.rsm.govt.nz/radio-spectrum/amateur-radio-operators-gurl/) Just six pages.

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