

SUMMARY

As requested, please find my responses to the consultation questions posed by the ACMA. In general, I can see the advantages of making the proposed changes, although there would appear to be some process definitions / changes that could be made to improve the overall experience of the Amateur Radio regulatory environment.

My desire is to see a simplification of the processes around proficiency assessment and callsign management. I am very impressed by examination system sponsored by the Federal Communications Commission that is managed and run by suitably qualified amateur groups in the United States. In the local context we could learn from their ability to administer amateur exams, of all levels, both in-person and remote, on-line with results available at the end of the session and licences and callsigns issued within a week.

Regards

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Callsigns held:
VK2EY, VK2DCR, N1KIQ, M1KIQ
[REDACTED]

Responses to consultation questions

1. *Do you see any reason for not extending secondary user access to the 50–52 MHz band for Standard amateurs? If yes, what is your reason? (See section 3.)*

No! It makes sense to extend this access for Standard Amateurs.

2. *What are your views on the proposed policy on call sign transfer? (See section 4.)*

The key features of our proposal for call sign management are:

- a) *the proposed class licence will include certain conditions relating to the use of call signs and allow a call sign entity to allocate call signs to qualified amateurs under an arrangement with the ACMA*

I agree in principle, however my preference would be for the call sign entity to be not-for-profit entity sponsored (and underwritten) by the amateur radio community. [I cite as an example the administration of the Australian Domain Name space by the AUDA (<https://www.auda.org.au>)]

- b) *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*

Agreed

- c) *the call sign entity would use the call sign assignment policy when assigning call signs to qualified amateurs under an arrangement with the ACMA*

Agreed

- d) *other matters relating to call signs would be more appropriately managed by the amateur community, potentially through the proposed amateur operating procedures document.*

Agreed. This might fall within the scope of the entity described in a) above.

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)?*

Yes. Both the United States and the United Kingdom operate on a 10-year renewal/confirmation cycle. This would be also appropriate in Australia.

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? (See section 4.)*

Benefits:

- Amateurs who upgrade to Advanced can apply for/contest for a 2x2 call, whilst retaining their former callsign which they have been become known by. [I have a personal interest in this as I currently hold two licences (callsigns) one a 2x3 with my initials and the other a 2x2 which is more useful on the HF bands]
- Equally an amateur may decide to keep a callsign issued before the callsign for life regime but also select one that better suits, e.g., personal initials, ease to use with Morse code etc.

- Or decide to select an additional callsign to reflect the relocation to a different state, whilst retaining the original callsign

Disadvantages:

- There appears to be a tendency to warehouse or hoard 'significant' callsigns, even now when an annual fee is required, so a lower cost might exacerbate this trend. For example, there is an ongoing demand for 2x2 callsigns by advanced amateurs, particularly in the eastern states, who would be disadvantaged by someone holding several 2x2 callsigns

In general, I would suggest that a limit of one 2x2 callsign per (Advanced) amateur might be appropriate with a ceiling of say 5 or 10 for the total number of callsigns held.

Clubs and Societies should be able to hold more, as while in general their membership and geographical spread may be relatively small, there are some larger organisations (e.g., Amateur Radio NSW, Amateur Radio Victoria and the state based WICEN groups that will have need for a significant number of callsigns)

5. *Do you have any concerns with the other proposed call sign management arrangements? If so, what are they? (See section 4.)*

Currently, a call sign is transferred by the transfer of the apparatus licence. We are proposing a process where the person with the assigned call sign surrenders that call sign, and nominates a new person to whom it may be issued. That new person will have one month in which to apply and pay for the call sign to be assigned to them. What are your views on the proposed policy on call sign transfer?

This appears to be reasonable – although I would suggest that some process be defined to allow for executors and next of kin of deceased amateurs to nominate the new callsign holder.

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? (See section 5.)*

I do make use of the services of QRZ.com however as this, like most services, is opt-in, the information is far from complete.

7. *Do you anticipate any difficulties operating your station in Conference of Postal and Telecommunications Administrations signatory countries? (See section 5.)*

Yes. Not being able to produce an Australian Amateur Radio Licence, when requesting a reciprocal licence/permit to operate in other administrations will make the recognition of one's qualifications more difficult. As far as I can see most of the overseas processes rely on the production of a physical Amateur Radio Licence¹.

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? (See section 6.)*

I do not think that this proposal is viable and is a retrograde step. There are currently no such limitations on the Advanced licence holder to conduct such experiments. By nature, amateur radio is experimental and limiting the scope of the range of experimentation is self-defeating. This appears to be a clumsy way to reduce the risks related to the use of higher power equipment, when a more practical approach is to ensure compliance of the amateur with the appropriate minimum radiation standards.

9. *Noting the proposal mentioned in 8, are there other amateur experimentation uses that require higher power that you think should also be considered under assigned scientific licensing arrangements? (See section 6.)*

My comments still apply, the nature of scientific experimentation means that it is not possible to place arbitrary limits on the scope and extent of the experiments. However, safety guidelines should be given and adhered to, particularly in situations with potentially higher risk factors.

10. *What are your views on the medium-term proposal to allow Advanced amateurs to apply for authorisation for other higher power use-cases under certain conditions? Please provide brief information to help us understand your view. (See section 6.)*

¹ I do note that in New Zealand: 'To operate amateur radio equipment in New Zealand your current amateur certificate of competency authorisation or licence must meet the requirements of Recommendations...'

I consider this to be a suitable approach, and I would support the management of high-power stations through the continuing use of the apparatus licencing system. This would ensure that the proper checks and balances are in place before high-power operations commence.

11. Is a 1kW power limit appropriate? Why or why not? If not, what alternative do you propose and why? (See section 6.)

Yes, it is consistent with the New Zealand environment and the same order of magnitude as available in the USA.

12. Are there particular bands that you consider should or should not be able to be accessed for Advanced amateur higher power operations? Which band(s) and why? (See section 6.)

No.

13. What use-cases would require stations to operate at power limits for Advanced amateurs higher than the 400W currently permitted? (See section 6.)

I don't have any specific use cases in mind.