



Response to ACMA's proposed Amateur Class Licence and Considerations for Higher Power Operation

11/22/2022

Proposed Amateur Class Licence and Considerations for Higher Power Operation

Response by Wagga Amateur Radio Club inc. (VK2WG) Lic No. [REDACTED]. The response represents the views of approximately 50 members.

Consultation Questions

1. Do you see any reason for not extending secondary user access to the 50–52 MHz band for Standard amateurs

No, 50 to 52 MHz should be available for Standard Licensed Amateurs. It is incongruous to us that Standard licence holders have access to one part of the 6metre band but not the other. The lower part of the band is where all distant contacts and digital mode contacts are made which places this licence grade at a disadvantage for no technical reason.

2. What are your views on the proposed policy on call sign transfer?

No issues with the proposed transfer of call signs.

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

No, this needs to be more specific – eg Licensee should be required to confirm that the callsign is in use at least every five years. If no response is received then the callsign allocation can be cancelled and made available for use.

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

We believe that there should be a limit to the number of call signs held to any one individual Licensee eg. Limit of 3 including a main station callsign, a remote station callsign and a contest callsign. Clubs should be able to have access to more callsigns for repeaters, clubhouses etc up to a maximum of 10. We do not see any advantage or benefit of an individual licensee holding any more than 3 callsigns. Besides drying up the pool of available licences it could lead to a grey or black market in the trade of such.

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

Yes – currently the ACMA Register is of great use to amateurs to

1. Ascertain the status of a particular callsign
2. Ascertain the licence privilege level for self-regulation purposes.
3. The general location of a station

Should this be passed to an entity to manage then it must be written into the Deed and provided at no cost similar to the way in which the public register is already maintained freely by the AMC. It only needs additional tweaking to show active callsigns, levels and general location. We believe that the Callsign entity is the only body that can guarantee data integrity of the callsign database.

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?

We do not believe that the Amateur License database should be handled by an overseas third party like QRZ - this needs to remain with an entity such as the ACMA authorised body maintaining the current public listing of available callsigns. The QRZ database is an US based opt-in style system and already has many incorrect and misleading data associated with a large percentage of the Australian callsigns held within its system.

We believe it will be a backward step to lose access to such a register as many of our members refer to this database almost daily because it is the only accurate way to check a license and/or the corresponding name associated with that license.

7. Do you anticipate any difficulties operating your station in Conference of Postal and Telecommunications Administrations signatory countries?

Yes - there will be issues, such as the validation of Licenses for Australian Amateurs if they need to travel and operate overseas in non CEPT countries

like the USA. This also applies to certain digital modes where proof of License is required to apply for access: eg Echolink and IRLP repeater systems etc. It could also be useful to show proof of licence when interrogated by traffic Police or other authorised bodies.

A further issue is that CEPT has modified its documentation to accept the new AMC issued AOC-P certificates, but does not recognise the older issued AOC-P certificates – these will require an individual letter of equivalence from the ACMA by each amateur wanting to travel to a CEPT country.

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?

Classifying Amateur EME (Earth-moon-Earth) communications under the Experimental Classification would be disastrous. This type of Scientific Apparatus Licence for these users would incur a very expensive yearly based fee of \$600 plus the likelihood of having to engage a qualified RF Engineer at commercial rates to ensure ARPANSA standards are being met which could put this activity well out of the reach of most amateurs. This goes against the whole idea of a hobby based experimentation and research activity and given that an amateur station does and can change station configuration regularly it would simply make the operation even further out of the question. We would favour the WIA's approach of education and a further level of licence type approach.

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?

The Wagga ARC fully supports the argument put forward by the WIA. We fail to understand why there are at least 12 other countries, many with higher population densities than Australia, that have up to and in excess of 6dB higher power levels than us without issue. Our current power limit puts Australian amateurs at a greater disadvantage especially during radio

contests and working distant countries using HF and this is where most amateurs are likely to use higher power. Even our closest neighbour, New Zealand, has a 1Kw option. While we understand that the ACMA has responsibility for EMR in Australia and that in most other jurisdictions the respective health departments have that responsibility, we believe ACMA is being over sensitive with the whole high power issue. As we have stated in the previous question this flies in the face of the whole concept of Amateur radio based experimentation and research. Amateurs do not gain any financial advantage for this type of activity so why classify them in an area that looks like it is for commercial based research activity under Apparatus style licencing.

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.

We support the opportunity for Advanced Class Amateurs to obtain the privilege of using a higher power capability and fully support the WIA submissions on this point. As previously stated we have grave concerns that Amateurs wishing to take up this offer will have great difficulty meeting the suggested ARPANSA EME requirements. These EME requirements are meant for commercial based operations that use expensive third party contractors and equipment to audit their sites. Also these sites once they have met these requirements hardly ever change their configuration. Amateurs change their RF configuration on a regular basis for experimentation and home brew requirements. This would mean a total re-assessment every time a transmitter, feed line or antenna was changed, an expensive and huge time wasting exercise.

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

We believe that a 1.0KW power limit is more appropriate for an Advanced Class License in Australia; this would bring us into step with other countries such as NZ and some European countries.

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?

Yes - we believe any frequency above the 70cm band (430Mhz) should be limited to 400 Watts because at these higher frequencies higher power may introduce inherent health dangers. Also frequencies in the LF range should also be restricted to the current level.

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

As previously stated when there are many stations competing to contact a rare and or a distant station on HF and we find we are competing with stations running in excess of 6dB more power we often struggle to be heard. This also applies to radio contesting. Also with the increased RF noise from third party electronic devices throughout the world which is causing increased difficulty for the remote receiving stations, extra power will allow the transmitting station to get above the noise level and make that contact.

14. For each use-case mentioned in 13, please briefly answer:

a. Why is a higher power limit needed?

As detailed in answer for Q13.

b. What are the specific limitations of the current power limit?

Won't be heard in certain situations, as outlined in answer for Q13.

c. What power level is required?

Probably a 6dB gain over 400watts, so around 1500 Watts Px or at least 1kw Px.

d. What is the technical description of this power level requirements (for example, transmitter output power, emission mode)?

The transmitter would generally need an RF power amplifier capable of about 62dBm (1500Watts) of RF PEP output power and for best efficiency the use of SSB (J3E modes)

e. What amateur service frequency bands would be used?

Mostly the HF bands, but could extend up to the 70cm band.

f. How often will a higher power level be required?

Whenever pileup and high receiver noise levels are encountered.

g. What is the location of the station?

We think that provided the APRANSA requirements are met then location should be irrelevant.

15. Should potential higher power authorisations be limited by location, position, event or something else? (See section 6.) Please provide details to support your answer.

We support the WIA's view on this matter. We believe that providing the station can meet the ARPANSA requirements then it should be authorised. We also believe that this can be met using further training and certification.

Other Concerns about the Class License and High Power Proposal.

RFI Protection by the ACMA

There is no text in either of these latest documents about RFI protection from Interference to the Amateurs parts of the spectrum. We assume from this, that the ACMA is supplying no protection from RFI interference from other users, commercial or otherwise.

We find this is unacceptable to the Amateur Radio community and the ACMA must supply some level of protection and procedures to help mitigate these problems. If we cause any interference we must immediately shut down as outlined in the documentation, so we would expect that the ACMA should do likewise with interference to Amateur users, after all the ACMA is the Spectrum Manager.

Equipment Classification.

Again there is no text in any of the documentation that is defining the type of equipment we should be using. Under normal Class Licencing arrangements the equipment used must be Type Certified, which would be totally against the whole ethos of experimentation and home equipment building that the Amateur community is built upon. So since it is not defined in the documentation are we to assume that this type of experimentation, modification and building of radio equipment is totally allowed?

The High Power Considerations

After reading the Consultation Paper and the Proposed Class Licence LCD documents, we believe that they are at odds with each other.

The Consultation Paper talks about considering the use of Higher Power for Amateurs who wish to do EME or special case considerations on a case by case basis. This would require these users to be classified under the Scientific Apparatus Licence regime at \$600 for 12 months.

But in the proposed Class Licence LCD it states that Amateurs can use higher power as long as they meet the ARPANSA requirements and satisfy the Power Compliance Level 2 as defined by the ACMA.

However, again, we support the Wireless Institute's view in this matter.

Conclusion to the Proposals

We would like to thank the ACMA for providing us with an opportunity to comment on the Proposal Papers.

We believe we should not be moving away from our Apparatus Licencing unless RFI safeguards can be met, Equipment type clarified, Issuing of real Certified Licences and the "No Worse Off Test" can be applied.

We support the WIA's proposals with regards to the higher power and believe it should be treated separately as per their proposal.

The other notable omission from this proposal is the addition of a further allocation to the 60metre band as per the ITU and that has been taken up

by many administrations including our close neighbour in New Zealand. We believe that Australian amateurs should be given the same limited access to this band as our NZ counterparts have.

Signed

A solid black rectangular box used to redact the signature of James Ashley.

James Ashley VK2NKJ
President WARC inc

On behalf of Wagga Amateur Radio Club inc. November 2022.