



HARG response to ACMA "Proposed amateur class licence and considerations for higher power operation: Consultation Paper"

Purpose

The purpose of this document is to set out the HARG response to the ACMA document *"Proposed amateur class licence and consideration for higher power operation: Consultation paper"* [ACMA, 2022].

The Hills Amateur Radio Group [Inc.]

The Hills Amateur Radio Group [HARG] was founded nearly 40 years ago and is located in the Perth Hills to the south east of Perth. Membership is drawn from across the Perth metropolitan area with several country members. The club currently has 54 members.

How we obtained the views of the membership

The members opinion on the fifteen questions posed in the consultation paper were obtained through the following means:

- Discussion on the weekly club days;
- Soliciting opinions to particular questions at two General Meetings;
- Preparation of a discussion paper summarising the background to each question;
- Polling of members through a survey.

This response has been formed based on the feedback from the above processes.



Questions and draft responses

Question 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?

Response

A poll of members at two General Meetings provided a divided opinion of members who voted with the majority of members abstaining. With no clear direction from the membership HARG response is neutral to the proposal.

Question 2

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

Response

HARG discourages any action that would facilitate the commercial trade of call signs. There is concern that if there is no barrier to the number of callsigns that an individual would be permitted to hold then one or more individuals could take all available callsigns or callsigns of particular interest, for example two letter callsigns to create a market. New amateurs would be forced to purchase a call sign from the market operator at whatever price was demanded. The bulk "parking" of callsigns would likely cause issues similar to Internet domain names, where domain names have become a commercial commodity with an asking price representing a perceived market value.

Two approaches to mitigate against callsign "parking" would be:

1. A fee charged by the assigning agency for each call sign issued of a quantum that would reduce the economic viability of creating a marketplace;
2. A limit on the number of callsigns permitted to be held by an individual.

If a callsign limit is implemented a total of ten call signs would ensure that there was flexibility for the individual to hold call signs for specific purposes—for example general operation, experimental operation and contesting—while ensuring that there is enough call signs in the unassigned pool for new amateurs.

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)?

Response

HARG would strongly support a regular check of a call sign holder's continued use of a call sign. The regularity of such checks would depend on the size of the available pool and any restrictions imposed in accordance with Question 2. The registry could be updated on a regular basis by the call sign holder logging in to confirm their continued use of the call sign, negating the need for the registry operator to become involved in regular updates or the call sign issuing authority could confirm the continued use of a call sign by another method such as an email alert with either a return email or a direction to a web site for the information to be updated.

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?

Response

The benefits of multiple are that those amateur operators are:

1. Amateurs who wish to identify their different operating modes, for example terrestrial propagation experiments, contesting or day-to-day operation may do so using different call signs; and
2. Those amateurs who travel across state borders, for example Fly In Fly Out [FIFO] workers, may operate with the geographic locator appropriate to their operational domicile.

The disadvantages of multiple callsigns are:

1. The potential for a market of to be created where blocks of call signs are taken by a one or more parties to deplete the call sign pool and therefore create a market for the call signs with associated pricing driven by supply and demand; and
2. The possible depletion of the call sign pool to the extent that there is not enough call signs available for allocation to new applicants.

Question 5

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

Response

HARG considers that while the removal of amateur call-signs from the RRL may meet the objective of the ACMA, however issues arise if the amateur radio community is expected to be self-managed:

1. As the amateur radio community will be expected to monitor and manage the operation of the amateur bands there is a need for a central source of allocated call signs to determine

the validity of a call sign being used on air and for the location of the station that is causing concern to be located to allow the issues to be resolved.

2. Without a central registry of issued call signs there is no method of validating the presence of an intruder on the amateur bands. The behaviour of some operators on the Citizen Band service demonstrates that an anonymous and unregulated environment can turn to chaos with bullying and anti-social behaviour a common practice on some repeaters in Western Australia.
3. A third-party opt-in service would not achieve the objectives of issues 1 and 2 above.
4. For the purpose of allocating new call signs, the call sign issuer would need to maintain a registry of issued call signs. HARG proposes that this registry be made available publicly or on a restricted basis for investigations of problems that may arise.

HARG is concerned that no mention is made within the document as to the administration of the VI call sign prefix.

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 would be of use?

Response

The reasons for maintaining a registry of issued call signs is set out in our response to Question 5 above. Any voluntary register would not achieve the requirement for identification of a call sign holder for the purposes of self management of the amateur bands.

Question 7

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

Response

The amateur radio community does not have direct access to the CEPT organisation and therefore HARG considers that there is a central rôle for the ACMA to negotiate the with the CEPT signatory countries to accept the form of qualification and conditions associated with the difference licence levels that are adopted in Australia.

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 proportion experiments?

Response

HARG supports amateur operators being issued with a Scientific Licence as an interim step to the issue of higher power being reviewed in the future. The terms and conditions as set out in the consultation paper appear to address the primary concerns of safety and interference to other services.

Question 9

Noting the proposal mentioned in [Question] 8, are there other amateur experimentation uses that require higher power that you think should also be considered under assigned scientific licensing arrangements?.

Response

HARG supports the issue of Scientific or higher power licenses for the purposes of experimentation and communication via celestial and terrestrial pathways for suitably qualified amateur radio operators who are prepared to meet the safety and interference requirements as set out in the Consultation paper.

Question 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 information to help us understand your view.

Response

HARG supports the issue of higher power privileges to Advanced amateurs provided that the electromagnetic energy [EME] safety guidelines are met.

Question 11

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

Response

HARG supports the granting of 1kW PEP privileges to Advanced amateurs as it would facilitate both celestial and terrestrial experimentation and communication without the added cost and administrative burden of applying for and maintaining a Scientific Licence. The following comments from members were noted:

1. The privilege should only be made available to Advanced amateurs.
2. The privilege should be available for both celestial and terrestrial experimentation and communications.
3. As it is intended that such privilege be extended through the use of an assigned license, conditions surrounding appropriate EME and record keeping requirements may be incorporated into the terms and conditions of issue of such a licence.

4. As noted in the consultation paper, the 1kW PEP privilege is available to amateur operators in countries such as New Zealand, Spain and Sweden. It should be noted, for example that there are many countries that permit amateur radio operators to operate with PEP level above 400W, for example Canada, 2250W; USA, 1500W; and in addition to Spain and Sweden, Belgium, Serbia and Switzerland permit 1000W.
5. The community service aspect of amateur radio appears to be absent from the consultation papers. Providing amateurs with the experience of operating with higher power would assist in their preparedness for supporting the community at a time of need.
6. The compliance requirements regarding EME safety and associated record keeping may be specified in a similar manner to that which is being proposed for the Scientific Licence.
7. The compliance or otherwise of an operator using higher power under an amateur licence or a Scientific Licence would conceivably not differ.
8. If the amateur community is to be charged with the responsibility of self-managing other aspects of the amateur and there is no reason why it should not be likewise for issues arising from the use of higher power.
9. The consultation paper suggests that there may be an issue with Standard and Foundation class amateurs being detrimentally impacted by Advanced amateurs using higher power. Advanced amateurs have the training and the knowledge to manage the use of the allocated spectrum. Again, any issues that arise may be addressed through similar processes of self-management as other aspects of the proposed changes.

Question 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?

Response

HARG would support higher power permissions being granted up to and including the 6 metre amateur band. Provision of high power above these bands may come with increased safety risk and at a high cost. It is considered that if an amateur wanted to experiment with higher power at frequencies above 54MHz that the option of a Scientific licence would be open to them.

Question 13

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

Response

As it is envisaged that the use of higher power would be made on a case-by-case basis the use-case for a particular circumstance would form part of the application process. The amateur service is an experimental service and to have pre-prescribed use-cases may limit future developments that would encourage experimentation in areas that are currently unknown.

Question 14

For each case mentioned in [Question] 13, please briefly answer:

- a. Why is a higher power limit needed?
- b. What are the specific limitations of the current power limit?
- c. What power level is required?
- d. What is the technical description of this power level requirements (for example, transmitter output power, emission mode)?
- e. What amateur service frequency bands would be used?
- f. How often will a higher power level be required?
- g. What is the location of the station?

Response

Refer to Question 13.

Question 15

Should potential higher power authorisations be limited to location, position, event or something else? Please provide details to support your answer.

Response

HARG supports a practical approach of an application for a higher power assigned licence. Factors mentioned in the consultation paper, such as: isolation from the public access to the station; location of the station relative to other residences; management of possible interference to other services; appropriate management of EME risk; and record keeping should all be considered.
