

# ACMA CONSULTATION: Proposed amateur radio qualification and assessor accreditation arrangements

Comments by

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I thank the ACMA for consulting with Amateur Radio Operators across Australia. The opportunity for us, as individuals to express our thoughts is very much appreciated.

While I generally support the process of requiring individuals to “qualify” via set examination to attain the respective licence levels of Foundation, Standard and Advanced – the current syllabi and exams are totally irrelevant to the so-called, ‘privileges’ granted at each ‘promotion’ to the next level.

To quote your Consultation Paper:

*“The requirement for operators of amateur radio stations to **hold an appropriate qualification** is a key element of the amateur radio service in Australia and around the world.”*

*“Candidates who successfully **pass a recognised amateur radio examination will be** required to apply to us for an ACMA recognition certificate. The certificate issued will correspond to the type of examination taken and to **the existing 3 types** of amateur radio qualifications – Foundation, Standard and Advanced:*

- > **ACMA recognition certificate (Foundation)** can be obtained following successful completion of the amateur radio foundation examination. This examination **provides an introduction** to amateur radio. It is the simplest and most suitable for those looking to become involved in amateur radio.*
- > **ACMA recognition certificate (Standard)** can be obtained following successful completion of the amateur radio standard examination. This examination increases in difficulty from the foundation level and is suitable for persons who have an intermediate knowledge of amateur radiocommunications.*
- > **ACMA recognition certificate (Advanced)** can be obtained following successful completion of the amateur radio advanced examination. This examination is the highest level a candidate can obtain for amateur radio and is suitable for persons with **complex knowledge** of amateur radiocommunications.*

*The 3 levels of qualification reflect the difficulty in the subject matter. Different licence conditions will apply to a person under the amateur class licence, depending on their qualification level. A person with an ACMA recognition certificate (Advanced), for example, will be able to **operate on more frequencies than a person with another kind of certificate**”.*

The current proposal includes no substantive change to the extant qualification framework. I have not read anything to suggest a possible review of the AOCF syllabus. You are changing some

names/terminology, but to use your own words, “the new qualification framework will retain the current qualification levels.

Again, to quote your proposal “A person with an ACMA recognition certificate (Advanced), for example, will be **able to operate on more frequencies** than a person with another kind of certificate.” It makes no mention, specific or otherwise of the technical aspects of the hobby ( which legally do not change from Foundation in so far as what may or may not be attempted as an Amateur.

Having passed the Advanced exam and been issued a licence or certificate does not necessarily equip that person with increased ability to operate on more frequencies. I have personally witnessed several new to the hobby enthusiasts with tertiary qualifications in electronics, breeze through the exams, jumping direct from Foundation to Advanced within a few short months – yet their on-air skills remained as they were the day they received their Foundation Certificate. They were confused, had no idea what to say, or indeed how to say it.. Their years of tertiary study to gain a degree in electrical engineering did not help them one bit in so far as being “able to operate”.

The technical ability required for an individual to **operate** on one frequency, is no different to **operating** on any other frequency - especially in the HF VHF and UHF arena. Using your example, when progressing from Standard to Advanced, I cannot see the link between having a higher technical knowledge, and one’s ability to operate, for example, on the 12m, 17m and 30m HF bands when that person is already “qualified” for access to the 10m, 15m and 20m HF bands. Yes, one must understand the bare basics of safely OPERATING a radio transceiver- but that knowledge is established and tested at the Foundation level - albeit with appropriate power limitations.

**Other than the Regulations exam** required for progression beyond Foundation, nothing in the respective syllabi addresses the operation (the on-air use) of a radio. Yet, from the moment a person passes the Foundation assessment and is granted a licence, regardless of their technical knowledge, they may legally build test and operate their own ‘home-brewed’ radio equipment. Surely, the only true justification for the “intermediate knowledge” required for the ACOP(S) and the “complex knowledge” required for the AOCP(A) is to better equip the hobbyist to build test and operate – yet you grant them that approval at the AOCP(F) – no in depth technical assessment - on Day One.

It is clearly stated in the DRAFT Amateur Radio Qualification Framework that “**The framework is designed to support the amateur radio hobby. However, it does not extend as far as offering vocational skills or experience that would enable a candidate to enter the workforce.**”

Regardless of Amateur Licence, we are ALL amateurs. It’s a hobby whereby, in my opinion, one’s proficiency should be judged more by on-air skills and ability, not by virtue of one’s technical knowledge. I find it somewhat ironic therefore, that similar levels of radio and electronic theory as well as formal procedural/regulations attained whilst trained and employed within a professional occupation are not always recognised (at least by the AMC) .... RPL requested by the applicant in order to be issued the AOCP(A) – a qualification which is applied to a recreational hobby...NOT the vocation/profession during which such training and real experience was acquired. (Refer to my RPL comments below).

Knowledge such as the difference between an Armstrong oscillator and a Colpitts oscillator may be tested in the AOCP(A) exam, but seriously – why should such knowledge be required just to access additional so-called privileges? Privileges that in no way require such knowledge. Other than transmit at higher power levels, what specifically do Advanced operators do that a Foundation licensee cannot also legally achieve without such knowledge?

The current AOCP(A) syllabus is better suited for a high power “Scientific” amateur licence. For everyday amateur radio operators who enter the hobby for the enjoyment of radio communication, such detailed technical knowledge is not required. Rather than build their own, as indeed some may, I suggest that most operators purchase commercial off the shelf (professionally built and having passed Australian standards) transceiver equipment.

With no requirement to sit additional technical exams in radio and electronic theory, the ACMA recently granted access to the 50MHz to 52MHz band for Standard licensees. I had hoped this heralded a significant change in policy that made complete sense, and that the introduction of a class licence framework would remove the hither-to complicated processes and administration required to differentiate between the three levels of Amateur Radio Operator Licence.

So, to reiterate, I do wonder why the assessment of “technical knowledge” should determine what frequencies can be used by respective amateur radio licence holders. There is no correlation. If the higher levels of technical knowledge had a direct and relevant connection to the “privileges” granted to Advanced licensees, then I would have no argument.... But I see no restrictions, other than output power levels that directly correlate to the level of one’s technical knowledge.

Though of no personal interest, I would welcome the introduction of a “high power Scientific” or if you like, AOCP(Scientific) licence for those who wish to delve more deeply into radio and electronics – as a hobby. Perhaps make the current “Advanced” licence the “Scientific” licence – but in so doing, adjust the radio frequency allocations for Foundation and Standard licensees so they can enjoy the full amateur HF VHF and UHF radio spectrum albeit at defined power limits.

A perhaps unpopular alternative to all this could be for the ACMA to charge a higher fee for the additional frequency band access and power levels (the privileges) and do away with the additional exams?

While much of this policy is influenced by Australia’s commitment to the relevant provisions of the International Telecommunication Union Radio Regulations (ITU RR), surely Australia – the ACMA - can determine how the respective levels of the Class Licence share the amateur radio spectrum. Give full HF access to Standard and Advanced licences – and grant the privilege of increased power levels and some much higher frequency bands (10 GHz and above) to the Advanced licence – or as I have suggested, introduce the AOCP(Scientific) Licence.

What you currently propose is just a re-badging of the system that has been in place for many years. The ACMA has correctly identified issues with the administration costs of this system, but it can be so much better (more relevant) and be simplified at the same time. The ACMA to its credit, wants to improve (reduce!) the admin and financial costs involved with licencing and assessments. So, make them connected, make them relevant and make them logical.

**In relation to on-line examinations** - I fully support the proposal – it should be open to ALL, not just those in remote areas. Some may be concerned over the opportunity for “cheating”. It is a hobby! AND across the world, and more so following COVID lockdowns, people can gain tertiary degrees on-line, with remote assessments and no direct supervision – and they DO obtain qualifications for vocational skills or experience that would enable a candidate to enter the workforce. Why is the amateur radio hobby so different?

**As for RPL** – When the ACMA resumes the functions currently held by the AMC, you also should consider ‘on merit’ applications for RPL which occurred prior to there being an Australian Qualifications Framework (AQF) circa 1990. This could be facilitated by the provision of official

written confirmation and record of employment in radio communications from the previous employer or government agency. The transition from professional employment to a recreational hobby does not present a High or even Medium risk of RF interference, indeed it presents very Low risk. It would also benefit the hobby by boosting the number of experienced radio operators available to mentor and encourage those who are new to radio communications.

Thank you.