



25th Sept 2023.

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority

By Online submission

Thank you for an opportunity to comment on the ACMA's Consultation Paper on 'Proposed amateur radio qualification and assessor accreditation program'.

Background

The Melbourne Electronic and Radio Club (MERC) is a club which primarily exists for the purpose of self-training, and technical investigations in radio communications and electronics. Our activities include:

- training of fellow enthusiasts, where club member or not, for the purposes of obtaining an Amateur Radio qualification;
- support of club members in their endeavours to improve their Radiocommunications knowledge, undertake technical projects and impart these skills to others;
- to develop shared resources such as local repeaters for the use of the club and wider amateur radio community;
- to support the WIA in its endeavours to promote and advance the Amateur Radio community;
- to engage with other community and service groups via the medium of Amateur Radio

As part of this process the Club has a number of assessors who work to help those interested in joining the hobby obtain a license.

The responses below have been presented in relation to the consultation questions presented in the consultation paper. Where no particular response is made in relation to a specific question this is because there was either general agreement with the proposal or no opinion was proffered by club members on that matter.

Question 2:

Do you have comments about the development and implementation of a wholly online system for examinations and qualifications in the future?

While an online system is ideal, the option to be wholly online would be problematic for assessments conducted in locations where internet coverage is poor or non-existent. While the online system should be the primary method of operation a manual or semi-manual system should be available to cater for circumstances where online operations are not possible.

Despite which process ACMA elects to make examinations available consideration should be given to publishing a limited set of questions, possibly in the form of an online example paper, to allow candidates to see the style of questions that will be asked when preparing for examination.

Question 3:

Do you have any comments on the draft accreditation rules (Attachment B), including the kinds of accreditation, qualifications and requirements of accredited assessors, process for applying and withdrawing accreditation, and conditions on accreditation?

It was generally considered that the draft accreditation rules were clear, concise and well written. A number of club members particularly appreciated the clear annunciation in s11 of 'Matters to have regard to before deciding accreditation' and s12 describing the 'Decision on accreditation' as they had not found the process applied by AMC-AR particularly clear.

Question 4:

Do you have any comments on the Accredited Assessor Guidelines (Attachment C)?

It was of particular concern that while the qualifications required to become an Assessor include a working with Children or Venerable Persons Check (WWC/ VPC), the general guidelines for assessors fail to incorporate the minimum physical safety principle included in all jurisdictions either explicitly or via risk assessments, requiring that a minor not be left alone or be out of sight one on one with an adult. We recommend that the guidelines be modified to include this basic physical safety principle when minors are examined and note that this requirement can be satisfied in a number of ways without compromising the other examination guidelines.

Question 5:

Do you have any comments on the RPL process outlined in Attachment A, or any comments or suggestions about how the RPL assessment process could be improved?

While our members were in general agreement regarding the RPL assessment process, it was considered that there was potential to further expand the number of equivalencies by declaring qualifications that are technically equivalent to an Australian licence but not regulatory equivalent as partially equivalent and requiring short regulations examination prior to the issue of an Australian license.

Question 7:

Are there any other matters we have not addressed in this consultation package that you believe should be addressed as part of the implementation of the new qualification framework?

As the ACMA has not elected to use its powers under s149 of the Radiocommunications act 1992 to include the details of Amateur Radio Class licenses in the RRL but has instead only appears to only have elected to provide minimal callsign information through a 'Public register of call signs and amateur details'. This is likely to have a number of consequences for licensed operators that include:

1. Difficulties in members of the Amateur Service being able to identify themselves as valid operators, especially when operation portable or temporary stations.
 - While a licensed operator may generally prove their qualification via the use of a formal qualifying document such as a ACMA recognition certificate or transition letter this is impractical for regular repeated use especially in an outdoor environment. Consideration should be given to either maintaining the use of the RRL under s149 of the Act or providing a portable card such as currently used to identify AMC assessors or holders of a Marine Short Range Operators Certificate of Proficiency.
2. An inability to determine whom is operating or is/ was responsible for a particular station be it a station identified by a regular callsign, special event callsign or a completion callsign.

- Currently this information can be obtained via the RRL and allows the IARU to direct transmission reports to operators. If the RRL is not to be available consideration should be given to at least:
 - o recording a name against each callsign issued in the public register.
 - o recording the regular callsign issued to the holder of a special event or competition callsign or if the holder does not possess an alternative callsign provide them with an option to register a postal address for publication.
 - and
 - o Consideration should also be given to recording the locality of the person responsible for that station or allow the holder to elect a postal address for publication in the register.

Question 9:

Do you have any comments on the proposed consequential amendments to the draft amateur class licence to incorporate the new qualification and accredited assessor frameworks?

Most of the consequential amends were understood and obvious, however, limited detail was provided on the restrictions on connection to a public telecommunications network. It was generally expected that such amendments were to retain the 'status quo' and as such would also be supported. If this is not the case it would be preferred that future consultation be undertaken prior to any additional restrictions being enforced.

Yours Sincerely,
Neil Wilson,
Secretary Melbourne Electronics & Radio Club,