

The Manager
Revenue, Cost Recovery, Budgets and Financial Operations
Australian Communications and Media Authority
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Thank you for the opportunity to respond to the ACMA's Public Consultation re: Draft 2023-24 Fees for service Cost Recovery Implementation Statement. I have read all the documents provided and provide comment as follows:

- I note the continued disparity in costs between the Amateur Radio callsignType 2 and Type 3 applications with regard to VK2,3,4 2-letter suffixed callsigns. This disparity appears to be without basis and defies logic. When considering the administrative burden, there should be no material difference in reviewing and assigning a specifically requested 2-letter suffixed callsign in VK1,5,6,7 or 8 when compared to the same application being made for a VK2,3, or 4 callsign. In fact, it could be argued that logically, it would take less time to review the availability of a specific VK2,3 or 4 callsign with a 2-letter suffix as there are generally less of them available at any given time. For example, on 26th September 2023, according to the public list of available callsigns (<https://csdb.utas.edu.au/Callsign/SearchUnallocated>) the following quantities were available in each of the state-based allocations:

PREFIX	Quantity of available 2-letter suffix callsigns
VK1	495
VK2	0
VK3	0
VK4	4
VK5	237
VK6	181
VK7	423
VK8	601

On the basis of the above, any application for a VK2 or VK3 2-letter suffixed callsign would be instantly rejected (minimal handling time) and for a VK4 2-letter callsign requires consideration against the 4 only callsigns available (again, minimal handling time). The time taken to process an application (as represented in the ACMA's document) should not negatively burden VK2, 3 and 4 applicants on the basis that their request would most likely be rejected (not that I believe that anyone would be applying for a callsign that didn't appear as 'available'). As such, there should be no material difference in the processing time and therefore no cost differentia and on this basis – I would be seeking the ACMA to collapse 'Type 2' and 'Type 3' applications into a single, coherent, aligned and non-discriminatory 'Type' with the same cost being \$41.45 as per the current Type 2.

Thank you for the opportunity to respond. Should the ACMA wish to seek clarification on any of the items raised above, I can be contacted by way of the contact details currently registered with the ACMA.

Kind Regards,

Cameron McKay