

Please pardon the informality of my submission. I do not claim confidentiality.

General Comment

In relation to the Callsign register.

I believe the publicly accessible callsign register could include the operator's given name and postcode in addition to the callsign and ACMA recognition certificate level. This will maintain the operators privacy, but will be of immense added value to the amateur community.

Question 1

Do you have any comments on the proposed qualification framework, outlined in **Attachment A**?

Looks good to me.

Question 2

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

I support this concept in principle.

There are many "off the shelf" commercial offerings available that would remove the need to have in house development and maintenance.

If there is an intention to actually develop such a system I would like to see the proposal first.

Question 3

Do you have any comments on the draft Accreditation Rules at **Attachment B**, including the kinds of accreditation, qualifications and requirements of accredited assessors, process for applying and withdrawing accreditation, and conditions of accreditation?

Agree with the accreditation rules.

Comments: Some assessors may not have as many opportunities to conduct assessments due to geographic reasons. The inability to conduct a minimum number over a certain period should not be a significant or sole reason for withdrawal of their accreditation.

I believe all accreditation should have a tenure and have to be renewed. Assessors should be required to signify acceptance of and compliance with the accreditation and behaviour rules in force at the time of renewal.

Question 4

Do you have any comments on the Accredited Assessor Guidelines at **Attachment C**?

The comments regarding re-sitting assessments presumes the candidate is using the same assessor. This may not always be the case as the candidate has the liberty of approaching any assessor, and may do this to resit the assessment.

In the provisions there does not seem to be any requirement on the candidate to declare that they are re-sitting an assessment at the same level.

I don't believe the assessors will have access to any information as to whether a candidate has attempted an assessment before.

Only the ACMA will have records of the number and level of assessments that a candidate attempts.

Question 5

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

Comment:

Any RPL activity can only identify equivalence of Theoretical knowledge, Practical knowledge can be assessed easily and should be validated. Competence in the Australian Regulatory requirements can only be done through a proper assessment as required for all candidates.

Question 6

Do you have any comments on the proposal to recognise Harmonised Amateur Radio Examination Certificates as a 'recognised qualification (Advanced type)'?

Comment:

Any RPL activity can only identify equivalence of Theoretical knowledge, Practical knowledge can be assessed easily and should be validated. Competence in the Australian Regulatory requirements can only be done through a proper assessment as required for all candidates.

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?

I think you have done an excellent job in bringing all required issues under control.

Question 8

Do you have any comments on the proposed fees for amateur qualification and call sign services outlined in the draft 2023–24 Fees Cost Recovery Implementation Statement?

These sound quite reasonable

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?

No

Question 10

Do you have any comments on the proposal to make a new legislative instrument, at the same time as the proposed amateur class licence is made, that would prevent any existing non-assigned amateur licences from being renewed further?

No.

Question 11

Do you have any comments on the proposed consequential amendments to the Radiocommunications Licence Conditions (Amateur Licence) Determination 2015, the Radiocommunications (Qualified Operators) Determination 2016, or the Radiocommunications (Charges) Determination 2022 to support the transition to the amateur class licence and incorporate the new qualification framework?

No