

The Manager  
Spectrum Licensing Policy Section  
Australian Communications and Media Authority  
PO Box 13112  
Law Courts  
Melbourne VIC 8010

Dear Sir/Madam

[Proposal to remake the Radiocommunications Licence Conditions \(Aeronautical Licence\) Determination 2015.](#)

Thank you for the opportunity to provide comments on the Draft Radiocommunications Licence Conditions (Aeronautical Licence) Determination 2025 (Aeronautical LCD).

Airservices Australia (Airservices) is a government-owned organisation that provides facilities and services for the safety, regularity and efficiency of air navigation within Australian-administered airspace. This includes providing air traffic services, aviation rescue firefighting services, aeronautical information services, radio navigation and telecommunications services.

The Aeronautical Information Publication (AIP) is a compilation of aeronautical information from multiple authorised agencies. Airservices is one of those agencies and coordinates the amendment and publication of the AIP.

Chapter 10 of the draft Aeronautical LCD introduces a definition of a callsign. The definition states:

**10 Condition – use of call sign**

- (1) A person must not operate an aeronautical assigned system station unless the person transmits:
  - (a) the station's call sign; or
  - (b) another form of identification that clearly identifies the station;at the start of each transmission, or each series of transmissions, made by the person.
- (2) In this section, **call sign**, for a station, means:
  - (a) the call sign specified for the station in the aeronautical licence (aeronautical assigned system station) that authorises the operation of the station; or
  - (b) a callsign approved by Airservices Australia, in accordance with the AIP, that relates to the station.

In relation to (1), when a person operating an aeronautical assigned system station initiates communications, the calling aeronautical station must identify the answering aeronautical station before they identify themselves. The language used in Chapter 10 of the draft Aeronautical LCD is not consistent with this practice and we have concerns that it may contradict the communication procedures defined in Volume II of Annex 10 to the Convention on International Civil Aviation.

In relation to (2), the aeronautical licence that authorises the operation of the station no longer specifies callsigns, therefore, over time all callsigns will need to comply with item (2)(b). While Airservices does approve some callsigns, other callsigns are approved by other entities (such as CASA or the International Civil Aviation Organisation (ICAO)). Introducing the requirement that Airservices approves all callsigns will impose an additional regulatory burden to the delivery of our services.

Airservices requests that the ACMA reconsider the wording in Chapter 10 that relates to the use of callsigns. We recommend that the person transmits (1) (a) or (b) “*with* each transmission or series of transmissions, made by the person.” and that callsigns at (2)(b) should be “a callsign approved in accordance with the AIP, that relates to the station.” so that variations to callsign approval can be captured fully within the AIP document, and the definition is future-proofed against changes to agency names and responsibilities, as occur from time to time. We also recommend that ‘callsign’ is used as one word to align with the AIP.

Please do not hesitate to contact us (at [REDACTED]; [REDACTED]), if you wish to discuss this further or require additional information.

Yours sincerely

[REDACTED]  
Air Traffic Management Standards

23 May 2025