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The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
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AMSA response to *Radiocommunications (Aircraft and Aeronautical Mobile Stations) Class Licence 2016* and the *Radiocommunications (Emergency Locating Devices) Class Licence 2016*

The Australian Maritime Safety Authority (AMSA) welcomes the opportunity to provide feedback on the sunsetting *Radiocommunications Aircraft and Aeronautical Mobile Stations Class Licence 2016* (AA class licence) and the *Radiocommunications Emergency Locating Devices class licence 2016* (ELD class licence).

AMSA has engaged with Australian Communications and Media Authority (ACMA) during the development of draft versions for both class licences. A key amendment to the ELD CL captured in the original draft is the addition of dedicated training frequencies for purpose-built search and rescue training distress beacons, and clarifications on self-testing and operational testing of devices.

Proposed changes

Both class licences:

AMSA has concerns that the definition of EPIRB (emergency position indicating radio beacon) in the *Radiocommunications (Interpretation) Determination 2025* may not capture an Emergency Locator Transmitter (ELT) which is carried by many aircraft. Additionally, the ELT does not have an Australian standard and has not been captured in the definition of **satellite distress beacon** in *subsection 5(2)* of both class licences.

AMSA recommends engaging with Civil Aviation Safety Authority (CASA) to ensure there is effective regulatory coverage of all 406 MHz beacon types.

ELD class licence:

Part 3 Condition for specific devices, sections 8 and 9. AMSA supports the inclusion of a regulatory provision that requires a person to obtain approval from AMSA before operational testing a beacon. AMSA's beacon testing policy currently covers both self-testing and operational testing, and a review is underway to expand the policy to include SAR training activities and the use of designated training frequencies. AMSA will remain engaged with ACMA to ensure the updated policy is in place prior to the amended ELD class licence coming into force.



AA class licence:

Part 3 paragraph 14(2)(c)(iv). AMSA supports the inclusion of 243 MHz. The frequency and function as a secondary distress beacon homing frequency is recognised in the ELD class licence and is also appropriate in the AA class licence.

Please contact Jacinda Sharp, Advisor Maritime Communications, on [REDACTED] or further information on this submission.

Yours sincerely

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