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**RE: Remaking the Emergency Locating Devices Class Licence**

I thank the ACMA for making the opportunity to comment on the Remaking the Emergency Locating Devices Class Licence.

**Locating signals in 156.8 MHz (marine VHF Channel 16)**

It is noted that locating signals on 156.8 MHz have been removed, which I support. My understanding is maritime survivor locating systems (MSLS) devices that use Synthesized Voice Announcements on 156.8 MHz (marine VHF channel 16) are no longer manufactured and effectively have been superseded by Recommendation ITU-R M.493/M.2135 'Class M' devices.

**Autonomous maritime radio devices**

In the proposed *Emergency Locating Devices Class Licence 2026*, there are no direct references to autonomous maritime radio devices (AMRDs) (Group A and Group B) which are authorised under the *Radiocommunications (Maritime Ship Station) Class Licence 2025*, and *Radiocommunications Licence Conditions (Maritime Ship Station) Determination 2025*, and which are described in Recommendation ITU-R M.2135-1 (most recent version) and ITU-R M.493-16 (most recent version).

In the definition of AMRDs in the above two instruments: the following note is reproduced:

Note 2: Recommendation ITU-R M.2135-1 divides AMRD into AMRD Group A and AMRD Group B. AMRD Group A is defined in that Recommendation to be AMRD that enhance the safety of navigation. The operation of man overboard (Class M) devices that are within AMRD Group A may be authorised by the *Radiocommunications (Emergency Locating Devices) Class Licence 2016*, or another class licence that replaces that instrument. The *Radiocommunications (Emergency Locating Devices) Class Licence 2016* is a legislative instrument and is available, from the Federal Register of Legislation at [www.legislation.gov.au](http://www.legislation.gov.au).

This draft *Emergency Locating Devices Class Licence 2026* does not make direct reference to AMRDs, or that AS/NZS 4869.3 might imply authorisation. It is true that AS/NZS 4869.3:2015 (an RTCM 2012 modified adoption) describes usage of MSLS/Ds using 156.575 MHz (DSC Channel 70), 161.975 MHz (AIS 1) and 162.025 MHz (AIS 2) as per AMRDs Group A, as described in Recommendation ITU-R M.2315.

However, AS/NZS 4869.3:2015 was published before Class M ('man overboard') devices (which use these channels) first appeared in Recommendation ITU-R M.493-14 (2015), and before AMRDs and Class M devices were described in Recommendation ITU-R M.2135 (first published in 2019). As such, the terms 'Class M' devices and 'AMRDs' are not used in AS/NZS 4869.3. These devices transmit locating signals, so it may be appropriate that AMRDs are included in the *Emergency Locating Devices Class Licence*, and, because their authorisation is also implied via the two Maritime Ship Station instruments mentioned above.

Further, Group B AMRDs are also authorised under the two maritime ship station instruments referenced above. Both the above instruments reference Recommendation ITU-R M.2135-1 for Group A and Group B AMRDs, and the frequencies they use are listed in the instruments.

Since 160.9 MHz (marine VHF channel 200G) for Group B AMRDs is included in the *Radiocommunications (Maritime Ship Station) Class Licence 2025*, and the *Radiocommunications Licence Conditions (Maritime Ship Station) Determination 2025*, it seems appropriate to include 160.9 MHz in the remade *Radiocommunications (Emergency Locating Devices) Class Licence 2026*.

It may be useful to consider including a Note like that quoted above as Note 2, regarding AMRDs in the *Radiocommunications (Emergency Locating Devices) Class Licence 2026*.

AS/NZS 4869.3:2015 might imply catering for what subsequently have become known as AMRDs Group A but does not directly mention AMRDs Group A or Group B. AS/NZS 4869.3:2015 does not reference Recommendation ITU-R M.2135, nor does it mention 160.9 MHz (marine VHF Channel 2006) which is used for AMRDs Group B, as the version of Recommendation ITU-R M.493 that is included in AS/NZS 4969.3:2015 was revision M.493-13.

At the time of writing, I have not been able to examine the 2024 edition of RTCM 11901.1:2012 standard, to see whether it mentions AMRDs or the most recent version of Recommendations ITU-R M.493 and ITU-R M.2135.

It should be noted that technical standard IEC 63269:2022, *Maritime navigation and radiocommunication equipment and systems - Maritime survivor locating devices (man overboard devices) - Minimum requirements, methods of testing and required test results* does reference Recommendation ITU-R M.2135 AMRD Group A Man Overboard (MOB) Devices, and Recommendation ITU-R M.493 Class M devices. However, it does not cater for AMRD Group B devices, as only AMRD Group A devices are subject to SOLAS regulations, defined by the International Maritime Organization (IMO). It references Recommendation ITU-R M.493-15.

Background (160.90 MHz): The ITU World Radiocommunication Conference (WRC) 2012 (WRC-12) allocated VHF marine channel 2006 (160.9 MHz) for “experimental use for future applications or systems (e.g. new AIS applications, man over board systems, etc.)”, subject to authorization by administrations, on a non-interference basis only, as per RR App.18, Specific Note r). At the WRC-19, the allocation was amended to reference autonomous maritime radio devices Group B, in accordance with the most recent version of Recommendation ITU-R M.2135. This reflected further deliberations at IMO and ITU, as the ITU revised Recommendation ITU-R M.2135 to reflect these decisions, which appears as M.2135-1.

#### **Minor comments**

1. Minor editorial: Section 5, Title of AS/NZS 4869.3: (a) 3<sup>rd</sup> line: Insert a space between “161.975” and “MHz” to read “... 161.975 MHz/162.025 MHz ...”.
2. Minor editorial: Section 7 Class Licence, Specific Devices (e): Insert a full stop after “a Radar-SART”.
3. Section 11, (2) Note: The reference to Recommendation ITU-R M.1371-5 could be updated to revision “-6” as this was published in February 2026. However, it is noted that the *Radiocommunications (Interpretation) Determination 2025* refers to M.1371-5 under the definition of the Automatic Identification System (AIS).
4. Radar SARTs: There is a small inadvertent error in the covering letter to the Consultation (p. 1, 2<sup>nd</sup> last para, where (Radar SARTs) is stated as being Radar Search and Rescue Transmitters, where they should be correctly stated as being Radar Search and Rescue Transponders, which only transmit when interrogated by an X-band marine radar using the 9.2-9.5 GHz frequency range. Correct usage is however, reflected in the draft instrument (‘Transmitters’ is the correct usage for AIS-SARTs only).

I thank the ACMA for consideration of the above comments.

Your Sincerely,

Peter Pokorny  
(signed)

(Formerly Principal Advisor, Maritime Communications (AMSA), and  
a serving member of joint AS/NZS Technical Committee RC-004,  
representing the Wireless Institute of Australia).  
This contribution is a private contribution.