Mr Alan Jordan
Space and Terrestrial Regulation Team
Radiofrequency Planning Group
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

12 January 2006

BY FACSIMILE
ORIGINAL BY MAIL

Dear Mr Jordan

Standard and Advanced Amateur Permitted Power Levels

In the (then) ACA's Outcomes of the Review of Amateur Service Regulation, May 2004, (the Outcomes), Appendix A, Permitted Power is specified as 10 W PEP all permitted modes for Foundation licensees, 100 W PEP for all permitted modes for Standard licensees and 400 W PEP all modes for Advanced licensees.

Subsequently, in your letter of May 2005 advising that the introduction of the Outcomes would be delayed, it was stated:

> "I also advise that the proposal to specify transmitter output power only in terms of Peak Envelope Power (pX) will now not go ahead. This change is due to concerns about the potential for increased human exposure to electromagnetic radiation and increased interference resulting from what would be an effective increase in transmitter power output for some emission modes".

You also state:

> "the ACA would appreciate the WIA's assistance to publicise this information."

The WIA has not yet responded, as it put a priority on the other issue, the introduction of the Foundation Licence. We are now addressing the permitted power issue.

In this context, we put on one side the power issue for the Foundation licence, because we have already requested the Authority to increase the power limit to 10 watts for the Morse, AM and FM modes, simply to enable use of readily available commercial equipment, particularly older equipment. It would assist us if the Authority could now indicate that it will be doing this at the first available opportunity.

The change in proposed policy, as advised in your letter, has caused the WIA to receive a number of representations from members and other amateurs, especially those operating experimental modes, who wish to operate above the respective average power (pY) limit but within the PEP (pX) limit.

The WIA believes such a change in amateur permitted power levels as proposed in the Outcomes would be consistent with international practice. Indeed, Australian amateur power levels would still be at the lower end of the scale internationally when compared with many other countries. It is also worth pointing out that the UK permits its amateurs 400 watts PEP all modes, and New Zealand permits 500 watts PEP all modes.

In regards to EMR concerns, for Standard licensees, such an increase to 100 watts PEP all modes would not require EMR compliance level 2 procedures.

In the case of Advanced licensees, while the EMR compliance level 2 High Power Permit procedure with its cost and constraints can be accepted at the kilo-watt level, the WIA believes it is unnecessarily onerous for advanced licensees wishing to operate only at power levels up to 400 watts PEP (pX), especially where the average EMR exposure is below the 6-minute limit. In particular, the requirement for assessment by a NATA accredited laboratory is seen to be a serious impediment in an amateur context, particularly in remote areas.

Accordingly, the WIA requests reconsideration of the decision not to continue the proposal in respect of power for Standard and Advanced in the Outcomes.

The WIA would like to explore the possibility of introducing an intermediate EMR compliance level, between compliance level 1 and compliance level 2 for amateur operation where mean power (pY) is between 100 and 400 Watts. We believe such a new level should provide for the Advanced licensee to self perform EMR compliance determination using EMR guidelines or an EMR calculator, without the need for NATA accreditation.

In regard to interference concerns, the WIA acknowledges that the interference impact of transmissions (especially to equipment such as hi-fi audio systems and telephones) is generally associated with the peak emission level of a signal rather than the mean power of the signal but we would like to explore the means of addressing such interference issues as may arise with a change to a p(X) power limit.

The WIA believes ACMA should not retreat from a better solution for amateurs as originally offered in the Outcomes paper.

Naturally, the WIA would be happy to further discuss these matters with you, though we would be much assisted by a more precise definition of your concerns.

Yours sincerely

Michael J. Owen

President
The Wireless Institute of Australia.