



WEST AUSTRALIAN REPEATER GROUP Inc.

(Affiliated Club of the Wireless Institute of Australia)

Serving Amateur Radio in Western Australia since 1975

www.warg.org.au

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West Australian Repeater Group Inc.

Submission to WIA Board - comment on Draft Repeater Policy released 1 September 2014.

Introduction

On behalf of the West Australian Repeater Group (WARG), a WIA-affiliated club with a 40-year history of building and operating Amateur repeater sites, I am pleased to respond to the WIA Board's call for feedback on the draft Repeater and Beacon Policy released on 1 September 2014.

Among the many aspects of Amateur Radio, repeaters are almost universal. Nearly every Amateur will use a repeater at some point in their time on air, and repeater policy matters for us all.

In June 2014 WARG wrote to the WIA Board to express some concerns regarding the development and application of WIA repeater policy; which we believed was not sufficiently transparent, consultative, or sympathetic to an experimental focus.

We know that those involved with the management and development of repeaters are faced with an increasingly complex situation, due to ongoing changes in spectrum demand, technology options, communications site availability and industry expectations. A small number of volunteer repeater workers are the ones in the front line. Pressure to simplify this complexity can lead to situations where local factors are not taken into account, or room for experimentation is lost.

While compromises are sometimes necessary to maintain things in balance, the Amateur community needs to be sure that any far-reaching decisions are the property of a well-informed WIA Board, and are not made in isolation or without consultation.

It's pleasing to note that this new draft policy addresses a number of WARG's concerns, and the Board and Advisory committee members are to be congratulated on their work in this area.

However, we believe some aspects of the draft policy need further development, and these are detailed in our comments and suggestions below.

WARG appreciates the opportunity to make this submission. Our concern is policy and process. We are not in any way questioning the dedication and effort of the individual volunteers who presently carry out repeater work on behalf of the WIA; their effort on behalf of all Amateurs is appreciated, and deserves our recognition and thanks.

Positive Changes

The invitation to comment on this draft policy addresses one of our key concerns, that repeater policy development was not transparent. We commend the WIA on this consultative approach, and look forward to further periodic review and consultation on this and other policies in future.

WARG is also supportive of the policy considerations regarding

- Optimisation of spectrum usage, particularly in congested areas
- Demonstrated EMR compliance for higher power license applications
- Encouragement of experimentation and self-education
- Flexibility in policy application, particularly for low and remote spectrum density areas
- The avenue of appeal to the WIA board for review of decisions

Concerns

In our view, the policy wording regarding power levels, portable repeaters and co-existence with commercial services needs to be better defined in order to maintain a consultative, flexible and experimentation-friendly approach.

Co-located Services

WARG agree that for congested sites in built-up areas with co-located commercial land mobile or similar services, operating Amateur services to land mobile standards is good practice.

However, there are sites where we Amateurs are the site owners and the other services are there on our terms. In some cases there are commercial services licensed, but no actual equipment ever likely to be installed. Technical solutions such as additional filtering also is in place at some shared sites to maintain isolation.

In these circumstances, WARG believe the proposed policy wording of "...generally apply(ing) land mobile standards....if the repeater is located close to non-amateur services" is overly restrictive. A suggested alternative could be: "...generally apply(ing) land mobile standards....if the repeater is likely to affect non-amateur services"

Point-to-Point Links

While the policy does not specifically refer to point-to-point link licensing, there are many cases where links face similar issues to repeaters, for example, needing to be licensed at higher power to operate reliably end-to-end. Default compliance with the ACMA's standards for Fixed point-to-point services (which mandate low power) will in many cases be overly restrictive to experimentation and flexibility.

Consultation Mechanisms

The example above also highlights the need for consultation and information sharing during the application process, as a volunteer repeater co-ordinator could not gain all the above information solely from a license application form and ACMA database.

One option could be to develop a how-to document, incorporating a guide as to which sections of the ACMA paperwork need completing, and a form for optional use by applicants to provide additional information in support of their application. A single "Repeater" page on the WIA website would also make it easier to find the necessary information.

Where an application appears non-compliant in its original form, consultation with the applicant should be the normal practice, not an option.

The West Australian Repeater Group Inc. (WARG) is interested in developing, installing and maintaining repeaters for amateur communications. The group provides a centre for information, advice and discussion on all matters pertaining to repeaters. We are affiliated with other amateur radio associations and co-operate with other bodies, including civil emergency organisations.

WARG thus believe the policy's proposed wording:

"WIA coordinators may contact an applicant for further information or seek permission to vary a licence application in order to ensure compatibility with this policy. If permission is not granted by the applicant the Coordinator will submit the licence application in its original form together with a negative recommendation from the WIA to the ACMA."

should be amended to read:

"WIA coordinators will contact an applicant to advise and discuss before varying any licence application that appears to contravene the policy. If a mutually satisfactory solution within the policy cannot be found, and the applicant still wishes to proceed, the Coordinator will submit the licence application in its original form together with a negative recommendation from the WIA to the ACMA."

Portable Repeaters

WARG are also concerned the policy is too restrictive in relation to portable repeater power output. For situations where a portable repeater is used for special event communications, 10W power may overly limit coverage. WARG use a portable repeater license predominantly for temporary site testing and evaluation, in this situation a higher power level close to that of a "production" repeater is desired. If a lower limit is needed, 25W would be better. Power can always be further reduced in the case of a specific problem. The sporadic nature of portable repeater use means the overall risk is low, and a "no interference, no protection" condition for these repeaters should protect other services.

Summary and Conclusions

WARG recognize that the WIA Board has a complex job in maintaining the relationship with ACMA, which is key to the continued existence of Amateur Radio in Australia.

We are aware that compromises in some policy areas - including repeaters - may at times be necessary, in order for the WIA to maintain the overall relationship with ACMA. However, such far-reaching decisions should be the property of the WIA Board, taken only with a full understanding of their impacts on the wider Amateur community.

In Summary

- Consultation on this policy is welcome and the WIA are to be commended for their efforts;
- The principle of optimising spectrum use is a good basis for the policy;
- It's reasonable for higher power applications to need to demonstrate EMR compliance;
- Flexibility, room for experimentation and an avenue for appeal are all good features;
- License restrictions should be based on the actual likelihood of co-located services being affected, not merely their proximity;
- Point-to-point link licensing also needs a flexible and experimental approach;
- Consultation with license applicants should be normal practice to clarify license applications which seem non-compliant; and
- The default power limit for portable repeaters should be higher.

WARG thanks the WIA Board for the opportunity to make this submission, and we hope that our comments will receive favourable review. Should you need more information or wish to clarify anything in this submission, please do not hesitate to make contact, we will be pleased to assist.

Signed: Anthony Benbow VK6AXB. President, WARG. 27th October 2014.

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APPENDIX:

About The West Australian Repeater Group (WARG)

The West Australian Repeater Group began in the early 1970s, as a group of enthusiastic radio amateurs whose aim was to build a 2 metre repeater to give coverage over the Perth metro area. Originally a WIA VK6 Division sub-committee, WARG formed as a separate group in 1975, and since that time has continued to grow; presently having around one hundred and twenty financial members, led by an active committee of nine persons. Several of our founding members remain actively involved, and our membership also includes communications professionals with significant industry experience. Our focus and key activity remains on repeaters.

WARG operates sixteen voice repeaters and a number of Packet/APRS services at eleven sites in Perth and regional WA. WARG also operates and maintains the VK6RWN DStar repeaters, and the NCDXF International HF beacon, VK6RBP. Our linked NewsWest repeaters carry the national and local WIA news every Sunday, and are used for other broadcasts as required.

In addition to the practical work of keeping eleven repeater sites going, WARG are also presently updating our policies, written procedures and site agreements to ensure we can continue to operate, whilst recognising current communications industry expectations.

WARG meetings are held monthly (except January) on the first Monday of the month; or the second, if the first is a public holiday. We hold a weekly on-air Technical and General net every Sunday at 1030 WAST, on repeater VK6RLM, 146.750. More information is available on our website www.warg.org.au