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The Australian Communications and Media Authority
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Consultation paper:
Proposal to amend and reissue:
Radiocommunications Licence Conditions (Amateur Licence) determination
Radiocommunications (Overseas Amateurs Visiting Australia) Class Licence

The Wireless Institute of Australia (WIA) welcomes the opportunity to comment on the proposed remake of these two legislative instruments.

The WIA understands that the proposed amendments serve to enable continuation of the Amateur Service, with little change to 'business as usual'. That said, the WIA reiterates the issues set out in our letter of 11 July 2014, and seeks to address them following the remake of these two instruments.

In this response to the Consultation paper, the Institute is principally concerned with commenting on the Amateur Licence determination (LCD), noting that the proposed amendments to the Class Licence for Overseas Amateurs Visiting Australia are administrative in nature to ensure the ongoing effect of the 2008 class licence is preserved.

The WIA notes that the Consultation paper highlights only one *Issue for comment*, that being the proposed amendment to remove advanced amateur licensee access to the segments 3.400-3.425 GHz and 3.4925-3.5425 GHz in the 3.300-3.600 GHz amateur allocation in proscribed geographic areas.

Comments concerning the proposed amendments to the LCD are addressed Part by Part below.

Part 1. 3 Interpretation

Page 3. ***Exmouth Non Directional Beacon Area.*** The Institute understands that there is no longer a 472 kHz non-directional beacon on at Exmouth and there is no entry in the Radiocommunications Licences Register. There is thus no further need to apply an exclusion zone around Exmouth and this condition could be deleted from the amended LCD.

Page 5. ***Timor Non Directional Beacon Area.*** The WIA agrees with the necessity to protect the aeronautical radionavigation service from interference, but takes issue with the size of 2000 km exclusion zone for the 476 kHz Timor Sea beacon. Reducing the exclusion radius to 1500 km would enable advanced licensees in Alice Springs (for example) to use the 472-479 kHz band, given that

stations are restricted to a maximum radiated power of 5 watts pX EIRP (Section 15D). The report ITU-R M.2203-2010 indicates a separation of 888 km for stations having radiated power of this level, and relaxation of the Timor NDB exclusion zone to 1500 km provides a substantial safety margin.

Reconsideration of the exclusion zone for the permitted power level on the 472-479 kHz band would be appreciated.

These comments also apply to the Class licence for overseas visitors.

Part 3. Conditions for amateur licence (amateur advanced station)

Page 16. **15 Operating an amateur advanced station in the frequency band 50 MHz to 52 MHz.** The WIA notes the removal of reference to television channel 0, to be replaced with reference to not causing interference to a service "that is specified a primary service for the 50-52 MHz band in the spectrum plan."

The WIA reiterates the position set out in our letter of 11 July 2014, Clause 2.4 – *Continued access to 50-52 MHz, preferably on a primary basis, in line with previous WIA representations.*

Page 17. **15AA Operating an amateur advanced station in the frequency bands 3.400 GHz to 3.425 GHz and 3.4925 GHz to 3.5425 GHz.**

The Institute understands that the exclusion of amateur operation from these spectrum blocks is to service the requirements of fixed wireless services for the NBN, within proscribed geographic areas.

The WIA draws your attention to our submission of 22 September 2014 concerning *"Consultation on draft Direction to use 3.5 GHz band spectrum for the National Broadband Network spectrum gap"*. Specifically:

> Loss of amateur access to 3400–3410 MHz and 3492.5–3542.5 MHz would directly impact the following amateur activities within Australia:
>
> a) weak-signal narrowband terrestrial communications within Australia and around the region;
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> b) Earth-Moon-Earth (EME, or moonbounce) communications, within Australia, around the region and globally;
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> c) future Amateur Satellite use in the 3400-3410 MHz segment; and
>
> d) exploration, experimentation and use of wideband transmission modes.
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> The WIA seeks to preserve the ability of amateurs to explore the technologies and techniques involved in all the above activities, as well as the ability to experiment with, or adapt, emerging technologies and applications in the future, including those not yet invented, all of which is in keeping with the ITU definition of the Amateur Service and the objects of the *Radiocommunications Act 1992*.

The Institute, and the amateur community, is concerned about the geographic extent of the exclusion zones, to be inserted in Schedule 4A (page 37). In particular, will the fixed wireless service PMTS Class B licensing conform to the description in the NBN Co *Fixed Wireless and Satellite Review (Final Report)* of May 2014, which identified that at least 80,000 premises in the metro fringe and hard to service areas of the mainland major cities will require an NBN fixed wireless service?

What forward plans are there to provide for expansion of PMTS Class B licence areas?

Most amateur use of the 9cm band in Australia is in 3400-3410 MHz, focusing on narrowband modes. Activity is temporally limited and sporadic in nature, generally involves narrow terrestrial paths using highly directional antennas, and infrequent moonbounce operation. Hence the interference risk is very low.

The issues of concern to the amateur community are:

a) preserving use of the 3400-3410 MHz segment as widely as possible across Australia,
b) the encroachment of the geographically proscribed areas, and
c) the likely growth of the geographic exclusion areas over time.

Schedule 2. Part 1 Permitted frequencies and emission modes

Page 32. **1A.** The WIA requests that, in relation to the 472-479 kHz band, a permitted bandwidth of 2.7 kHz be specified, rather than 2.1 kHz, as this enables use of the widely available single sideband suppressed carrier mode while excluding full carrier amplitude modulation.

The currently specified 2.1 kHz permitted bandwidth for the 135.7-137.8 kHz band should be retained.

These comments also apply to the Class licence for overseas visitors.

Conclusion
The WIA looks forward to the remake of the LCD and the Class licence for overseas visitors.

Yours sincerely,

Phil Wait VK2ASD
President