



WIRELESS INSTITUTE OF AUSTRALIA

PO Box 2042
Bayswater
Victoria 3153 Australia
Phone: + 61 3 9729 0400
Facsimile: + 61 3 9729 7325
nationaloffice@wia.org.au
ABN 56 004 920 745

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SUBMISSION: Proposed updates to RALI LM 2 and MS 42 IFC: 17/2016

The Wireless Institute of Australia wishes to respond to the proposed update to RALI MS 42, specifically in relation to the 70 – 87.5 MHz band.

The WIA signified to the ACMA the amateur radio community's interest in obtaining an allocation at 70 MHz in July 2014, in an invited submission to Ms Ann Chadwick, Policy Analyst, Industry Partnerships Section, concerning the then-foreshadowed remake of the Radiocommunications Licence Conditions (Amateur Licence) Determination No. 1 of 1997. See Appendix 1, para 2.5.

Subsequently, the WIA reiterated interest in gaining a 70 MHz allocation in our submission to Mr David Brumfield, Executive Manager, Communications Infrastructure Division, Spectrum Management Policy, in April this year, and again in a meeting between Mr Brumfield and the WIA shortly after. See Appendix 2.

It is the WIA's expectation that this matter can be addressed during the consultation process for updating the Australian Radio Frequency Spectrum Plan later this year. The WIA anticipates providing a comprehensive submission at that time.

The WIA is seeking an arrangement for access to a band within 70.0-70.5 MHz under Article No. 4.4 of the ITU Radio Regulations, initially. The WIA understands that No. 4.4 provides that operations do not cause harmful interference to the radio services or communications of other services, and that the possibility of harmful interference from such services and communications is accepted.

In summary, the WIA seeks an Amateur Service allocation as a secondary service within 70.0-70.5 MHz, that is preferably congruent with, or overlapping, allocations in other countries, in Region 1 for example. A recent, comprehensive survey of 70 MHz amateur allocations across Region 1 can be found at: http://www.70mhz.org/index.php?categoryid=2&p2_articleid=316

It is understood that interest in, and use of, 70.0-70.5 MHz has declined over recent years, and few licensees across Australia have maintained services and operations in the band, although it is understood that defence retains a general interest in the use of the 70-87.5 MHz band.

The WIA looks forward to pursuing advocacy for an Amateur Service allocation within 70.0-70.5 MHz during the consultation process for updating the Australian Radio Frequency Spectrum Plan later this year.

Yours sincerely,

Phil Wait VK2ASD
President

Attached: Appendix 1, Appendix 2.