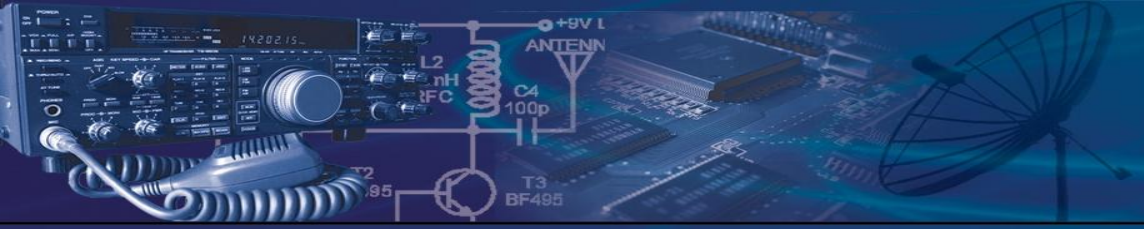
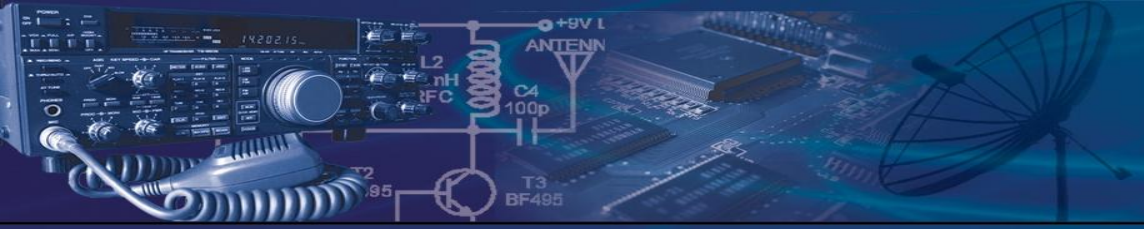


Wireless Institute of Australia
Amateur Radio New South Wales
Amateur Radio Victoria
Australian Ladies Amateur Radio Association

Key Principles
Joint response to ACMA proposal
Changes to Amateur Radio Licence Conditions



Principles

Our submission has been developed on the basis of:

- Protection of the Individual
- Protection of the Public
- Protection from Interference

Principles

The information presented herein has been provided by:

- Several surveys that were undertaken in response to the FYSO consultation
- Direct responses from members and affiliated clubs, prior to and during the 6 week consultation period for this response.

Contents

- Response to ACMA proposed LCD Technical Changes
- Proposed Licence & Qualification Structure
- Proposed Alternate Technical Proposals
- Proposed Changes to Callsign Allocation

Technical LCD Changes

We congratulate the ACMA for the material positive improvements proposed in the Omnibus Amendment Instrument 2019 (No.1) for foundation licence holders, including:

1. Higher power options

2. Availability of digital modes for foundation licence holders

Technical LCD Changes

The following variations to the ACMA proposal are submitted:

1. It is current practice to use SSB on 630m. We request that the permitted bandwidth in the 630m band be increased from 2.1kHz to 2.7kHz to in line with commercial equipment standard bandwidths.

2. Standard licensees should have 16kHz occupied bandwidth in the 28-29.7kHz band.

Technical LCD Changes

3. Whilst the offer of 400W PEP(pX) for foundation users is generous, there is widespread consensus that a power level of 50-100W pX (15-30W pY) for foundation users is more appropriate.

4. Notwithstanding further proposals for High Power transmission, 400W pY for advanced licence use will provide an effective increase in transmission power in many modes within the same EMR envelope. Other jurisdictions (eg. NZ) have adopted pY across all modes.

Proposed Technical LCD Changes

50-54MHz - Changes - No opposition

70-70.5MHz - We will no longer be pursuing this allocation

917-926MHz - We will no longer be pursuing this allocation

Proposed Technical LCD Changes

7. Removal of 400MHz in the 3.x GHz band

   We recognise the value of this band to the broader community for the delivery of UMTS/5G services and as such reluctantly concede that band should be contiguously available for commercial activity. It, however, remains an important experimentation band.

   A proposal is included for the 60M (5MHz) band that we feel will partially redress this loss.

Proposed Licence & Qualification Structure

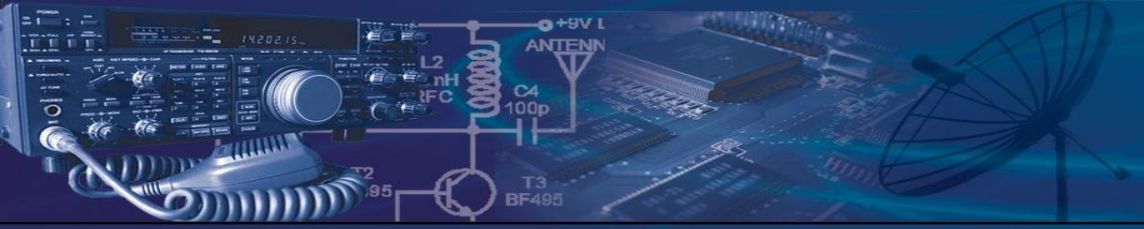
- The consensus is that retaining an entry level licence is vital.
- Potentially reduce number of qualifications to 2 - Foundation and General (Advanced) to minimise overheads if it can be demonstrated that there is a net social benefit to the amateur community.
- Many assessors historically recommend that people sit advanced FIRST (only sitting standard if the candidate fails advanced)
- International experience shows clubs in UK choosing to teach only foundation and advanced and not “intermediate”
- A transition arrangement for the cessation would need to be developed should the Standard licence class be made obsolete.

Proposed Licence & Qualification Structure

- Globally harmonised standard General (advanced) qualification (HAREC).
- Ensure long term syllabus advancement/development by partnering with an international peer (eg RSGB). This is not an adoption an overseas syllabus, rather input to the development process which will assist in international recognition.
- HAREC qualifications to accompany localised regulations.

Proposed Licence & Qualification Structure

- Whilst this may seem like a novel approach there is significant precedent for adopting and localising Internationally accepted bodies of work:
    - Australian Accounting Standards Board
    - Australian Design Rules for motor vehicles (e.g Euro 6)
    - IECEE CB Scheme



Proposed Licence & Qualification Structure

"We are most concerned of any reduction of the level of knowledge, construction ability, and operating skills covering a whole range of modes, be it voice, digital, or even Morse.

The practical applications of these skills and knowledge are always available from all licenced Amateurs to the wider community whatever be the need .

The ability to mentor, teach, and pass on these attributes to all, including our next generation, is paramount to our being.

We wish to be able to continue to serve this objective to provide a base of Radio Communication operators, and help provide a career path for students, without any reduction of skill or "Dumbing down" of knowledge.

Amateur Radio creates world-wide friendship and understanding by sharing a common topic at a technical level as a bond, and to be able to share our experiences. This allows the development of further friendship and growth in mutual understanding of different cultures and life styles."

Trevor Quick VK5ATQ
Peter Watts VK5PX
Charlie McEachern VK5VC
(North East Radio Club)

Proposed Licence & Qualification Structure

- Foundation qualification to be subset drawn from HAREC syllabus + localised regulations.
- Care must be taken to manage syllabus creep to ensure foundation remains accessible to all.
- It should be noted that there is a significant cross section of our community that are involved in Amateur Radio for social reasons and hold foundation licences - and are not intending to advance.

Proposed Licence & Qualification Structure

- Our community is seriously concerned that placing the licence within the AQF will, in time, result in cost and geographic availability barriers to entry to the Amateur service.
- ACMA must commit to ensuring that the mechanisms introduced for obtaining an Amateur qualification do not, now or in the future, negatively impact the accessibility of the service.

Proposed Licence & Qualification Structure

- It is proposed that a “self governed” approach be adopted whereby non-profit organisations manage cohorts of like minded operators within the parameters of an agreed “operations manual” or “code of conduct”.
- There is precedent for this in Australia.
- The Civil Aviation Safety Authority (CASA) had delegated management of recreational aviation to self administering sports aviation organisations. These are then responsible for day-to-day enforcement of standards and operational rules.

Proposed Alternate Technical Proposals

- 60M, 5MHz - 3 Channels be allocated AU wide (1 already held by WIA, plus ARNSW)
  - User must be contactable by phone at a registered number (as per OFCOM)
  - 2.7kHz, upper side band, 15W EIRP
  - Advanced licence holders only.
  - operation of narrowband digital modes be permitted between channels across the band.

Proposed Alternate Technical Proposals

- High Power Operation
  - The Amateur Service is an experimental, educational and research radio service. High Power operation has the capacity to provide a much needed “training ground” for those wishing to enter industry.
  - We support the ACMA offer to accept high power licence variations on a case by case (including the use of experimental licences where appropriate).

Proposed Alternate Technical Proposals

- High Power Operation (cont.)
  - In time a “high power” endorsement should be created that satisfies the ACMA that holders have the capability and requisite test equipment to operate safely at higher power levels.
  - The availability of this endorsement will reduce the difficulty in ACMA assessing the suitability of operators wishing to operate at higher power levels on experimental licences.

Proposed Callsign Changes

- Remove the 4 letter foundation call signs.
- Make 3 letter callsigns available to all licence holders (with the exception of embargoed allocations for repeaters). State based prefix to remain.
- Permit single letter callsigns to be allocated to clubs on a short term basis (eg: 4 weeks max) and fair usage basis due to the very limited number of available callsigns per state.