

## WIA Submission – Part 5: Remaining licence issues

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### SUMMARY

- Clarifying definitions
- Use of internet-connected repeater systems by Foundation licensees
- Radiation Safety
- Callsigns

### 5.1 Clarifying definitions

Several issues have arisen over time where the regulation does not give clear guidance to licensed radio amateurs. Many of these issues have arisen as a result of regulatory development not keeping pace with new technologies available to the amateur service.

For instance, some digital mode transmissions do not lend themselves to current station identification requirements. The current requirements for the operation of repeaters do not consider repeaters that are internet-linked to other repeaters nationally or internationally.

In addition, the WIA seeks clear rules regarding the remote operation of amateur stations that are not amateur repeater stations. This includes: an amateur station located in a remote (non-urban) region, operated and controlled by the licensee who is not present at the station location, or the operation of an amateur home station by the licensee who is not present.

It would be of assistance the amateur service to have these issues clarified within the regulations, thus reducing the burden of regulatory intervention and interpretation issue-by-issue as they arise.

#### 5.1.1 WIA Survey– Clarifying definitions and intent of some current provisions

The WIA seeks clarification of these provisions in the Amateur LCD 2015:

- Clause 7 – interference
- Clause 8 (1) – brief transmissions, station identification requirements
- Clause 8 (6) – retransmission
- Clause 9 (1) – operation of repeaters

There is a level of uncertainty and confusion within the amateur radio community concerning these particular provisions. They need to be clarified and resolved for future licence conditions.

In particular, in Clause 9 (1), the examples relating to (c) and (d) refer to older or legacy technology, and would be better if re-worded to include more recent and emerging technologies.

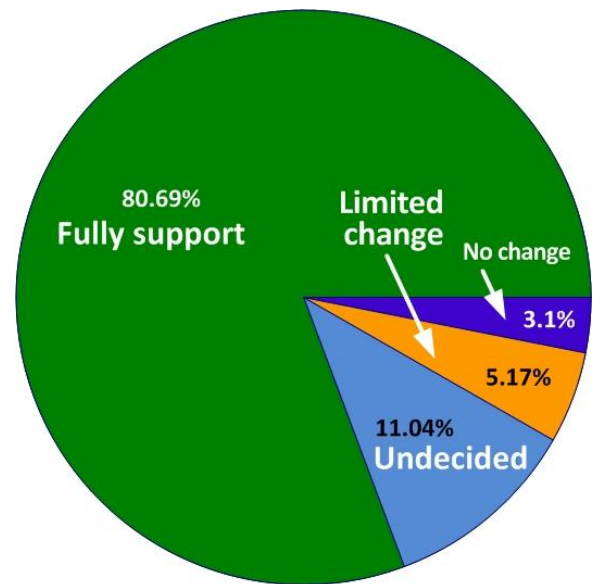
Respondents were asked their view on this issue, with a choice of four responses:

## Clarifying definitions and intent

N = 290

	Fully Support	Favour Limited Change	Undecided	No Change
No.	234	15	32	9
%	80.7	5.2	11.0	3.1

Over 85% of respondents support clarification of the definitions and intent of the affected clauses.



Phase 3: Clarifying definitions & intent of some current provisions

## WIA Recommendation:

That the WIA and the ACMA work to clarify the intent of the affected provisions.

## 5.2 Use of internet-connected repeater systems by Foundation licensees

Internet-connected repeaters are proliferating through the amateur service in Australia and internationally. There are issues where a Foundation licensee can connect through an internet-linked repeater but has no control over the power, or bands where this transmission may be rebroadcast. The rebroadcast may be outside the licence conditions of the Foundation licensee.

The WIA believes that the Amateur LCD 2015 does not adequately cover the issue of internet-connected repeaters.

### 5.2.1 WIA Survey– Clarifying definitions and intent of some current provisions

The WIA seeks clear provisions to be incorporated in future Amateur licence conditions.

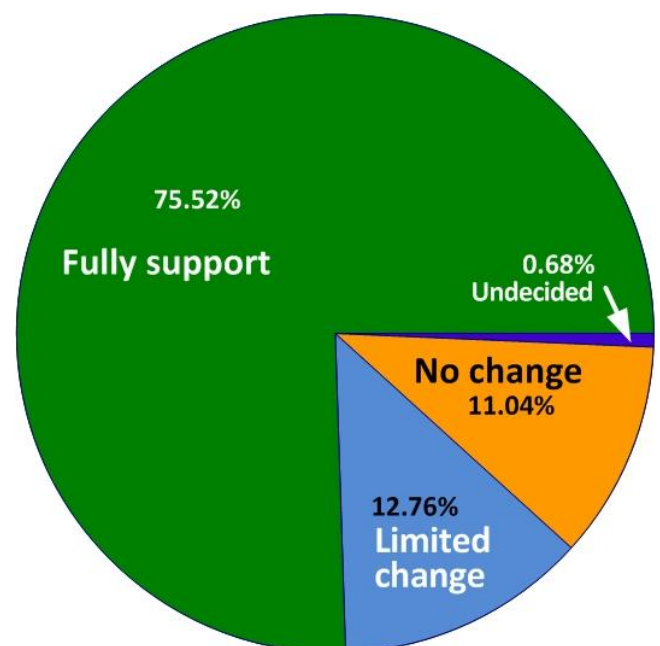
Respondents were asked their view on this issue, with a choice of four responses.

## Review of net-connected repeater use by Foundation licensees

N = 290

	Fully Support	Favour Limited Change	Undecided	No Change
No.	219	37	2	32
%	75.5	12.8	0.7	11.0

Over 88% of respondents support clear provisions to be incorporated in future Amateur licence conditions, in keeping with the general principle of ensuring licensees' ability to explore and experiment with the



Phase 3: Review net-connected repeater use by Foundation licensees

least impediment, balanced with responsible use of the spectrum and respect for other stakeholders.

## WIA Recommendation:

That the WIA and the ACMA work to ensure clear provisions are incorporated in future Amateur licence conditions, particularly in relation to internet-connected repeaters.

## 5.3 Radiation safety

Radiation safety is a very important issue for radio amateurs.

Since the end of the High Power Trial in 2013, the WIA has conducted an education campaign to raise awareness in the Australian radio amateur community of licensees' responsibility in Electromagnetic Emissions (EME) compliance. To encourage and educate Australian radio amateurs, material has been published in the WIA's journal *Amateur Radio*, on the WIA's website, and delivered in presentations at WIA AGM and Conference weekend events, to affiliated radio clubs, as well as at the Central Coast Amateur Radio Club's annual Field Day, the biggest gathering of radio amateurs from around Australia.

Hence, it is now fair to say that awareness of EME compliance requirements is much greater as a result of these initiatives. In addition, awareness of EME compliance is now incorporated in the AOCP assessments.

However, compliance with the Apparatus LCD (remade in 2015) is "invisible" within the Amateur LCD (also remade in 2015), and is only brought to licensees' attention on their licence documents. The WIA wishes to see EME compliance clearly highlighted in future Amateur Licence conditions.

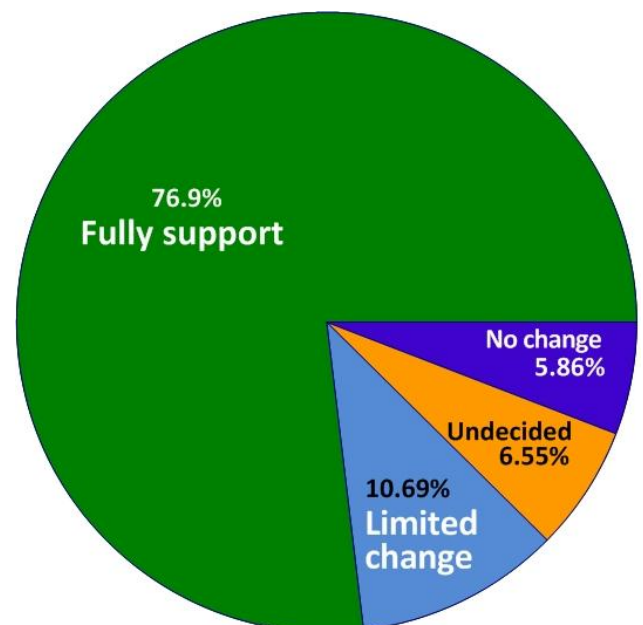
### 5.3.1 WIA Survey - Clear visibility of licensees' Electromagnetic Emissions compliance responsibility

The connection with the related determination (Apparatus LCD 2015) on the important issue of EME should be incorporated in future Amateur licence conditions, clearly setting out a licensee's accountability for meeting EME compliance requirements. In addition, a review of the existing published guidelines would aid licensees' meeting compliance.

Respondents were asked their view on this issue, with a choice of four responses:

**Clear visibility of licensees' EME compliance responsibility**

N = 290	Fully Support	Favour Limited Change	Undecided	No Change
No.	223	31	19	17
%	76.9	10.7	6.6	5.9



Phase 3: Clear visibility of licensees' EME compliance responsibility

Over 87% of respondents support the inclusion of conditions on Electromagnetic Emissions (EME) in future Amateur licence conditions, including compliance requirements.

## WIA Recommendation:

That EME compliance be clearly highlighted in future Amateur Licence Conditions.

## 5.4 Callsigns

The amateur service is one of the last radiocommunications services to use callsigns; however, they are extremely important to the operation of the amateur service and licensees value them very highly.

Callsign prefixes identify the country and the State only. The class of licence held is identified in the following three or four letters.

There are issues with the use of a 4-letter identifier for the Foundation grade not being widely recognised as discussed in Part 2 of this submission.

Special-purpose callsigns are allocated to licensees to commemorate a special event, but the term “special event” is not well defined and some special event callsigns have been allocated to events that would probably not be considered “special” enough.

The WIA administers amateur radio callsigns in Australia on behalf of the ACMA and seeks a review of the callsign arrangements to determine if they remain fit for purpose.

### 5.4.1 WIA survey - Callsigns – prefix and suffix patterns, and special callsigns

The WIA seeks a review of the patterns of use of prefixes and suffixes to determine if they remain fit for purpose. The review is to include:

- custom-and-practice to date concerning special event and special callsigns that are generally obtained and used for defined or limited-period occasions
- Foundation licence callsigns, highlighted in Part 2 of this submission.

Respondents were asked their view on this issue, with a choice of four responses:

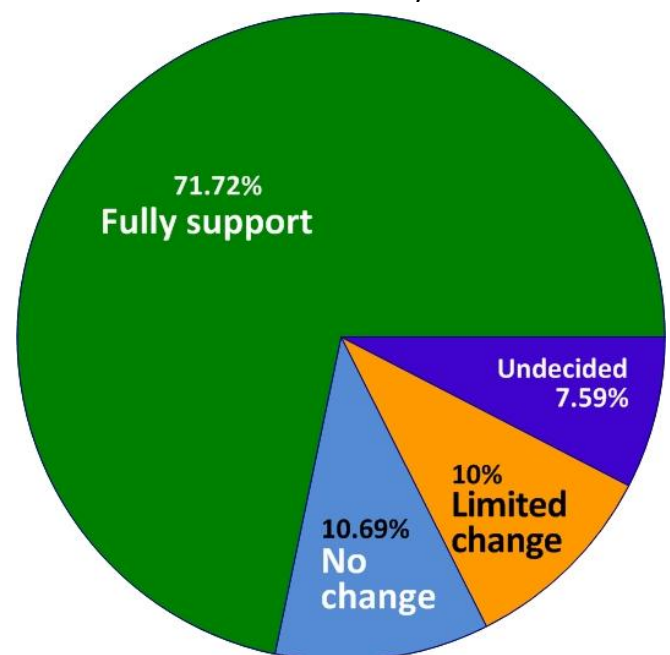
**Review of callsigns**

N = 290	Fully Support	Favour Limited Change	Undecided	No Change
No.	208	29	22	31
%	71.7	10.0	7.6	10.7

**Over 81% of respondents support a review of the patterns of use of prefixes and suffixes to determine if they remain fit for purpose.**

#### WIA Recommendation:

That the WIA and the ACMA review patterns of use of amateur callsign prefixes and suffixes to determine if they remain fit for purpose.



Phase 3: Review callsigns – prefix and suffix patterns; special callsigns