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The Manager
Spectrum Management Outlook and Strategy Section
Australian Communications and Media Authority
PO Box Q500
Queen Victoria Building NSW 1230

Response to Draft Five-year spectrum outlook 2020–24. Consultation number IFC 09/2020

Dear Sir/Madam,

The Wireless Institute of Australia thanks the ACMA for the opportunity to comment on the draft Five Year Spectrum Outlook. The WIA makes the comments in this submission:

1. Regarding COVID-19 (P.11). The WIA has suffered the same impact as most other Australian organisations and a number of important technical, administrative and radio-sports events have been cancelled or postponed. However many radio clubs have used the opportunity to hold their meetings on-air using voice or television in place of the usual face-to-face meetings. There has been a significant increase in on-air activity during the lockdown period resulting in higher levels of social inclusion and community well-being.
2. 3300–3400 MHz (P. 41). The view of the WIA is that the 3300 – 3400 MHz band still has significant amateur interest and activity, and it can share with the incumbent services. The WIA wishes to retain amateur access to the band.
3. 47 GHz (P. 45). While noting that there are no formal arrangements for the 47.2 – 48.2 GHz frequency band, the WIA requests that any future arrangements for the band ensure that any spurious or out-of-band emissions from devices operating in the 47.2 – 48.2 GHz band do not impact the primary amateur allocation in the 47 – 47.2 GHz frequency band.
4. 2300 – 2302 MHz (P. 48). The WIA will make a submission covering this band when the ACMA commences consultation on the issue. It is still in use by Australian amateur operators in particular for international EME communications.
5. Spectrum arrangements for 'small' satellites (P. 60). The WIA has significant concerns about the possible use of the 435 – 438 MHz frequency band by satellites which are not operating under conditions of the amateur service. The WIA is keen to contribute to discussions on the issue of potential changes to existing regulatory environment. There are global concerns about this issue and the International Amateur Radio Union is involved in discussions with national amateur radio societies to resolve some of the emerging problems.
6. Amateur radio (P. 62). The WIA has commissioned a poll to collect the views of Australian amateurs and has made a separate submission to the consultation covering the 5351.5 – 5366.5 KHz frequency band. The WIA supports an amateur allocation in the band.

7. Amateur certificates of proficiency (P. 74). The WIA is committed to ensuring that the syllabus, training and examination systems remain fit for purpose and provide an accessible and affordable entry into amateur radio for interested people. The WIA is very concerned at the apparent large drop in numbers of people passing through the exam service since the change in provider. The WIA requests the ACMA investigate the matter and is prepared to work with them on developing solutions to this problem.

8. Review of non-assigned amateur and outpost licensing arrangements (P.76). The WIA is keen to ensure the continued regulatory 'visibility' of the amateur service and will provide input during the proposed consultation phase of the issue. The WIA believes that the removal of individual licenses will create future compliance issue in Australia and also limit the ability of Australian amateur operators to take out a foreign amateur license when travelling to another country.

9. Compliance and enforcement (P. 80). The issue of electromagnetic compatibility and interference from a variety of devices continues to cause problems for many amateur operators and the WIA welcomes the audit process which it hopes will reduce the issue of non-compliant devices which have the potential to cause harmful interference to all users of the radio frequency spectrum. More generally the WIA hopes that greater attention will be placed on the prevention and mitigation of interference from electronic devices and systems, including the emerging problem of harmful interference to the high frequency bands, from some VDSL installations, on-line photovoltaic / battery storage installations, LED lighting and air-conditioner inverters.

The WIA is willing to provide any additional information that may be useful for dealing with the above issues.

The WIA will make further submissions on the following matters:

10. The WIA still has an interest in an allocation at 70 MHz.

11. The WIA is still committed to pursuing a revised callsign structure

We look forward to working closely with the ACMA on these issues and the spectrum outlook for 2020-24.

Yours sincerely

Peter Clee

Peter Clee
WIA Secretary

24 June 2020