ACMA Consultation into
Amateur Radio Qualification
Arrangements

Submission by
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1. Introduction

By definition amateur radio is a hobby that centres around self training and technical investigation in radiocommunications\(^1\). It has a long history of over 100 years and has played a significant role in the development of scientific understanding in the areas of electronics, mathematics and physical science. Amateur radio has been part of STEM education long before the term was coined.

The Australian Government Department of Education and Training states “The Australian Government regards high-quality science, technology, engineering and mathematics (STEM) education as critically important for our current and future productivity, as well as for informed personal decision making and effective community, national and global citizenship\(^2\).” Amateur radio can continue to play its part in the National Innovation and Science Agenda\(^3\). The omission of the WIA, representing amateur radio in Australia, from the consultation list in the position paper on STEM by the Office of the Chief Scientist of Australia is a clear indicator that change is required\(^4\). Amateur radio's future can be either part of the National Innovation and Science Agenda or increasing obscurity as “an unfashionable quintessential geeky hobby”\(^5\). Training and qualification arrangements will be key factors in determining its fate.

2. Overview

2.1 Amateur Radio Station - mandatory requirements

The station must be licensed. This licence is issued by the ACMA to a natural person or to an organisation. Radio clubs and Scout groups are typical examples of organisations to hold such licences. It is not unusual for Scout groups to retain licences without possessing amateur radio equipment or having a member who holds an AOCP. They rely on volunteer amateur radio operators to provide the equipment and operator qualifications appropriate to the occasion when required. The station is allocated a callsign in consideration of a recommendation from the WIA.

The station must be operated by a person who holds an AOCP. AOCPs are currently issued to individuals by the WIA under a deed of arrangement with the ACMA.

Usually, an amateur radio operator only requires proof of an AOCP when applying for a station licence within Australia or in another country. Checking the validity of a “statement of attainment” from an existing or defunct RTO will be a difficult administrative burden within Australia. The likelihood of a foreign administration accepting such a statement is problematic. The ACMA consultation document has foreshadowed the need to change legislation if an AOCP is no longer issued.

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\(^3\)http://innovation.gov.au/page/agenda
\(^5\)https://www.makeuseof.com/tag/5-reasons-may-want-ham-radio-home/
2.2 Current assessments and qualifications process

Assessments are currently conducted by WIA accredited assessors spread throughout Australia. The WIA assessors are volunteers trained to an appropriate level by the WIA. This system provides excellent geographical diversity and flexible hours of availability. The WIA provides centralised administration and control of the assessment process ensuring that the terms of the deed of arrangement with the ACMA are fulfilled. This combination reduces the disadvantage to individuals who would otherwise be compelled to travel to larger centres and be available during business hours.

The WIA issues successful candidates with an AOCP and facilitates station licensing including callsign recommendations. The AOCP issued is a permanent record of achievement and provides readily verifiable proof that the person has the appropriate qualifications to establish and operate an amateur radio station. A station licence with its associated callsign is issued for a finite period of time. These differences are important and need to be maintained.

2.3 Current training arrangements

The WIA does not conduct amateur radio training courses. The WIA has produced a textbook “Your Entry into Amateur Radio”. This book forms the basis of most two day Foundation level courses conducted by many amateur radio clubs throughout Australia. The WIA also retails a number of textbooks through its bookshop including texts written for the Australian market.

Very few clubs offer training for higher level certificates. Training for higher level certificates usually takes the form of training sessions held one night per week over many weeks. An exception is the Summerland Amateur Radio Club which, as well as conducting two day Foundation courses, conducts 4 day Standard and 5 day Advanced courses annually. This format has proved popular with candidates who prefer a compact course rather than one which requires multiple visits to a training location over several weeks. Reduced travel and avoiding the need to reschedule other commitments over a prolonged period are raised as advantages of this format.

Two independent training organisations associated with, but not controlled by the WIA, are The Radio and Electronics School in Queensland6 and Ham College in Western Australia7. These organisations offer training support for all three levels of amateur radio licence.

Any future training arrangements will need to operate in an environment where candidates have limited financial and time resources.

6http://www.res.net.au/
7http://www.hamcollege.com.au
3. Comments relevant to the terms of reference

3.1 Approach one

Approach one—an approved body to provide training, conduct examinations and issue certificates of proficiency through delegation under the Act.

I consider that retention of certificates of proficiency is vital. ACMA meeting domestic and international obligations is also vital. The requirements for the tenderer to be an RTO or to be associated with one is of concern. It may disadvantage organisations such as the WIA which offer considerable geographical and cost advantages. The RTO requirement may not be necessary if the tenderer provides an examination service but does not provide a training service.

3.2 Approach two

Approach two—RTOs to provide training, conduct examinations and issue statements of completion (not as a delegate under the Act)

I consider the lack of certificates of proficiency to be inappropriate. It increases the complexity of validating statements of completion within Australia and overseas. The lack of accreditation under the Australian Qualifications Framework is of concern. This moves the responsibility of maintaining appropriate standards away from the AQF and back to the ACMA. The ACMA would need to resource compliance monitoring as the AQF could correctly claim that any compliance issues regarding non accredited qualifications are outside their responsibility. The methods of delivery envisioned in this approach are relevant to all approaches. The requirement to change relevant legislation is considered an additional complication to be avoided unless required.

3.3 Approach three

Approach three—RTOs to provide training, conduct examinations and issue statements of attainment for accredited qualifications on the Australian Qualifications Framework

I consider the lack of certificates of proficiency to be inappropriate. It increases the complexity of validating statements of completion within Australia and overseas. The inclusion of amateur radio units of competency under the AQF is a significant step forward. Inclusion under the AQF would integrate amateur radio qualifications into mainstream education. The exclusion of all but RTOs from this approach is likely to lead to significant cost in acquiring amateur radio qualifications. It is also likely to drastically reduce the geographical availability of any courses offered. The requirement to change relevant legislation is considered an additional complication to be avoided unless required.
4. Conclusion and recommendation

The amateur radio qualifications administration practices put in place in 2019 will determine the future of amateur radio in Australia. It is an opportunity to incorporate amateur radio into the Australian Government's commitment to improve the STEM skills of Australians. The wrong decision will cripple amateur radio in Australia.

I consider none of the three approaches are acceptable. Approach one maintains current arrangements which perpetuate the irrelevance of amateur radio to mainstream education and employment. Approach two introduces no advantages over approach one and does not provide certificates of proficiency. It introduces administrative disadvantages. Approach three does not provide certificates of proficiency and runs a significant risk of making amateur radio qualifications financially and geographically beyond the reach of many Australians. It has the advantage of integrating amateur radio qualifications into the AQF by making them the exclusive domain of RTO's

I recommend that a fourth approach be considered.

Approach 4 – The OMC model.

The Office of Maritime Communications (OMC) manages the marine examination and certificate service for the Australian marine community under a Deed with the Australian Communications and Media Authority – ACMA. Under this arrangement the OMC issues certificates and performs a similar responsibility to the WIA under its deed of arrangement. The successful tenderer would be “approved by the ACMA to conduct examinations and delegate the ACMA’s power to issue certificates of proficiency. Delegation would be made under s122A of the Act”.

There would then be three ways to obtain a certificate of proficiency:

- Successfully complete an examination (as currently available); or
- Apply for recognition of prior learning (as currently available); or
- Submit an application for the recognition of a Unit of Competency (UOC).

An appropriate training package and units of competency would need to be developed. Any RTO authorised to deliver these competencies could then offer this pathway to candidates in the same way as RTOs currently offer their services to Marine Radio Operator Certificate candidates. Unit of Competency “UEENEEB101A Operate and maintain amateur radio communication stations” is currently available. This UOC is listed as included in one training package and seven qualifications. The same source lists 32 RTO's approved to deliver the UOC. Evidence of the UOC ever being offered by these RTO's has not been found. The UOC was released in 2012 and may need revision. The acceptability of a UEENEEB101A as evidence of prior learning is unknown.

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9http://www.amc.edu.au/industry/omc/certificates
10Approach One – ACMA consultation paper
This approach retains the issue of certificates of proficiency, maintains the ability for a candidate to self study or attend geographically and chronologically suitable courses conducted by non accredited trainers, or to study via an approved RTO. No changes to legislation is foreseen. This approach will require the revision of the syllabi for each grade and development of UOCs. Approach 4 offers all the advantages of approaches 1 and 3. It is not a new concept as it is already in place for Marine Radio Operator Certificates. The OMC model demonstrates the cost minimisation and geographical diversity of this approach. Cost minimisation, geographical diversity and inclusion in the AQF are important part of the future of amateur radio.

I offer my services as a volunteer to assist in the revision of the syllabi.

5. Author details

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My career as a telecommunications engineer spanned over 30 years in the planning and design of switching and transmission networks. I was the Supervising Engineer of one of Telstra's regional engineering offices. My final task with Telstra was to conduct a national audit of 3rd party utilisation of Telstra's radio sites.

I have held an amateur radio licence since 1975. I have been a WIA accredited Assessor since 2006 and have conducted over 130 assessments. I am also a Life Member of WICEN NSW.

I am currently Summerland Amateur Radio Club Vice President and Education Officer. As Education Officer since 2009 I have developed course notes for Standard and Advanced courses and conducted 5 day Advanced courses and 4 day Standard courses annually since then. I have also developed self study notes for the Regulations exam that reduce the Regulations course to a few hours of self study and a one hour revision session prior to the exam.