

Sean McQueen

From: Nicholas Brody
Sent: Tuesday, 31 March 2020 4:20 PM
To: gregk. altera WIA President; Glenn Dunstan
Cc: Patrick Emery; Sean McQueen; Stewart White; Aidan Mountford
Subject: FW: Foundation licensees - call sign structure [SEC=OFFICIAL]

Categories: Yellow Category

Dear Greg and Glenn,

I have been made aware that RASA has issued a news alert to its subscribers advising them of the content of the email I sent to both organisations yesterday afternoon.

The news alert advises that "The ACMA has today decided to remove the connection between callsign suffix and licence class for all three letter callsigns."

We have already received several enquiries from the amateur community, very rightly expressing surprise and concern that the ACMA's apparent decisions are being communicated by RASA rather than by the ACMA; and I myself was surprised that RASA has pre-empted the outcome of this process, given that I advised both agencies that my colleagues and I had formed a view about a preferred option, and that our next step would involve submitting this view to the AMC for its consideration.

I am authorising both agencies to use the following text when dealing with enquires that this news alert will provoke. The ACMA will use words to this effect to respond to enquiries:

ACMA staff have been considering submissions on call sign policy from both the WIA and RASA, chiefly to facilitate access to digital modes by foundation licensees. This follows the ACMA making the enabling regulatory changes to the amateur LCD in 2019. The Australian Maritime College (AMC) administers aspects of amateur radio on behalf of the ACMA, and the ACMA will seek the views of the AMC before making a decision on call sign policy. The ACMA will notify amateur radio stakeholders, and will update its website, when it makes a final decision on this matter.

Regards

Nicholas Brody
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I would like to acknowledge the traditional custodians of this land on which we meet, work and live. I recognise and respect their continuing connection to the land, waters and communities. I pay my respect to Elders past and present and to all Aboriginal and Torres Strait Islanders.

From: Nicholas Brody

Sent: Monday, 30 March 2020 4:14 PM

To: 'Glenn Dunstan' <president@vkradioamateurs.org>; gregk. altera WIA President <gregk.altera@gmail.com>

Cc: Patrick Emery <Patrick.Emery@acma.gov.au>; Stewart White <Stewart.White@acma.gov.au>; Sean McQueen <Sean.McQueen@acma.gov.au>

Subject: Foundation licensees - call sign structure [SEC=OFFICIAL]

Dear Greg and Glenn

I am writing to you both in relation to implementation of a call sign structure that can facilitate access to digital modes by foundation licensees.

As previously indicated, call signs are not strictly a regulatory matter for the ACMA, but rather a matter of administrative policy. Where the ACMA can assist in facilitating changes to the administration of call signs, we have a preference to do so with reference to the views of users of the system – that is, amateur licensees.

It is disappointing that the WIA and RASA could not agree on a single approach to canvassing the amateur community on implementation options. Nonetheless, the surveys conducted by both organisations have been useful on this occasion.

My colleagues and I have considered the representations of both organisations. Having regard to the survey results, and to our own views about the benefits and feasibility of the options, we have formed the view that a 3 letter call sign with no 'licence class' identifiers (that is, the call sign does not indicate whether a licensee holds advanced, standard or foundation qualifications) is preferable.

I intend to submit this view to the AMC for its consideration. I would prefer to do so with the mutual support of both the WIA and RASA. The timing of a discussion with the AMC is, as I am sure you can appreciate, a little uncertain. The COVID pandemic has required re-prioritisation of resources within the ACMA, and I am sure the AMC/UTAS are experiencing similar. With that in mind, I'd ask you to respond by Friday 10 April.

I want also to make both the WIA and RASA aware that I do not consider this process to have established a precedent for engaging with the ACMA on similar and future matters. The ACMA endeavours to consult widely and transparently in relation to regulatory reform, and appreciates the role of representative bodies in synthesising community views and providing coordinated responses. With respect to the implementation of administrative policy, I do not consider the conduct of competing surveys and the submission conflicting representations by the WIA and RASA to be an effective way for representatives of the amateur community to engage with the ACMA.

For future submissions on both regulatory and administrative matters for amateur radio, I ask that you make submissions to our annual consultation on the *Five-year spectrum outlook* (FYSO), which is the ACMA's principal tool for engaging stakeholders on spectrum management. As an agency, we allocate our people and resources based on annual projections of work. It is difficult for the ACMA to accommodate *ad hoc* requests for reform, and engaging with the ACMA through the FYSO process will allow us to appropriately allocate resources for amateur radio.

Kind regards,

Nicholas Brody

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