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The Manager  
Spectrum Licensing Policy Section  
Australian Communications and Media Authority

RE: Review of non-assigned amateur and outpost regulatory arrangements – consultation 01/2021

Dear ACMA,

The consultation paper regarding amateur licencing makes several references to “no interference, no protection” and the goes on to say the following:

*Non-assigned amateur licensees currently operate on shared frequencies and are similarly afforded no protection from interference.*

This is contradictory to the Australian Radiofrequency Spectrum Plan 2017, which states in sections 11 and 12 that primary allocations are protected against interference from secondary allocations, and that both allocations are protected against interference from non-allocated sources (generally speaking). Amateur radio has several primary allocations that confer interference protection from non-amateur sources, as well as secondary allocations that confer interference protection from non-allocated sources.

I note that the current LCD says nothing about the protection provided by the Spectrum Plan, and that simply replacing the current LCD with the proposed class licence would not be a backwards step for the hobby. **The proposed class licence appears to directly copy the content of the current Amateur LCD in all areas where “interference” is mentioned.**

It seems that the explanatory statements in the consultation paper differ in their intent and this is the likely reason for the poor reception that Option C has received by the Amateur Radio community.

The ACMA points out that class licencing is already in place in several countries, including New Zealand. This is evidence that class licencing can work, and the goal of reducing regulatory burden is one I fully support.

I also acknowledge that the ACMA has limited resources for dealing with interference issues involving amateur radio, and we are not paying a huge amount of money in spectrum licencing for the privilege of the ACMA’s time. Nevertheless I feel that to thrive we do require legislative protection. Being a technical hobby, we should be more than capable of gathering sufficient information to make an interference determination via email a straightforward process.

With appropriate interference protection and preservation of operational utility of the hobby acknowledged more clearly I think the class licence would be widely supported as a win for both parties.

Regards,  
Geoff Van der Wagen VK2AVR