

To: The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Law Courts, Melbourne VIC 8010

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

Dear Sir,

Thank you for the opportunity to comment on the Review of Non-assigned Amateur and Outpost Regulatory Arrangements – Consultation 01/2021. I provide the following responses to the consultation paper:

I have considered the three options under review:

- **Option A:** keep the existing apparatus licensing arrangements and licence conditions.
- **Option B:** simplify the current licensing arrangements and licence conditions by amending the amateur LCD.
- **Option C:** transition to class licensing arrangements for non-assigned amateur stations, with assigned amateur stations continuing to be authorised under apparatus licensing.

I support the ACMA's desire to simplify the current arrangements and note that similar changes have taken place in several other countries where a simplified no cost license is in place. As far as I have been able to ascertain, these arrangements are perceived as generally satisfactory although my knowledge mainly relates to the UK which has some differences to the proposed Australian Class License.

I would like to see more detail around the ACMA's preferred Option C and would mention the following points:

- Will there be a database to record licensee's privileges, station address, call signs, contact details etc and a means to login to amend, revalidate or cancel?
- Will there be an individual document provided by the ACMA that can be used to apply for overseas reciprocal licenses and other purposes?
- In the case of interference from a source that is in clear contravention of regulation and where local resolution has failed, will the ACMA still have a role?
- Will the ACMA continue to uphold and protect the amateur service primary frequency allocations in accordance with international agreements?
- Amateur equipment is not generally type approved and may be of an experimental nature – there would need to be no disadvantage with the proposed class licence.
- Compliance with ARPANSA EME standards is important but potentially a very complex area. Whilst amateur stations generally use low power and make only

intermittent transmissions, there may be frequent apparatus changes when experimenting with antennas, setting up portable stations etc. A simplified risk assessment based approach would be preferred as a means to demonstrate compliance.

Yours faithfully,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line that tapers to the right.

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