

Response to the ACMA Amateur Radio License Proposal by John Shutte (VK2EMF) Lic No. 1969700/1

Firstly I would like to thank the ACMA for allowing the Amateur Radio community to comment on the ACMA proposal “**Review of non assigned amateur and outpost regulatory arrangements – consultation 01/2021**”.

I have extensively read the ACMA proposal and researched all related documents and presentations on this proposal, including the results from other countries where a similar Class Based License systems have been implemented for Amateur Radio Operators in those countries.

The following is my response to the proposal:

Option A: Keep the existing apparatus licensing arrangements with the same conditions.

I believe this is the best option of the three provided in that it does not determent the existing privileges, conditions and protections that the Amateur Radio License holders currently have. This is the only one that passes the no disadvantage test.

Option B: Keep the current Apparatus Licensing system, but simplify the current LCD.

This option may have been interesting, but lacked any details especially of the LCD which basically nullifies it from being selected as a real contender.

Option C: Transition to class licensing arrangements for amateur stations operating on common frequencies.

I personally believe that this option presents the greatest threat that Australian Amateur Radio operators have ever experienced, even greater than being totally banned from operation during the War periods.

Here are my concerns about Option C:

No Protection from RFI

As we have seen in the last 10 years, the QRM problem in most urban areas has grown exponentially and is a huge issue to most amateurs. In the next few years there is an even greater QRM threat coming down the pipeline with LED streetlights being rolled out by most councils and if these units are badly designed and installed you are looking at 500 watt signal generators every 100 meters or so in our neighbourhoods.

Also as is starting in Europe at the moment, is the installation of road based car charging systems, where cars drive over the charging coils installed into the roads to get recharged and apparently these are KWatt signal generators and cause massive RFI problems.

Then there is the increase in Military OHR installations like the JORN Australian sites causing massive interference to the Amateurs HF bands.

So that is why I would like to see a government body like ACMA representing us, to help protect us from these and other possible RFI outcomes, which the Class License will not facilitate.

Eventual Loss of Spectrum Privileges

If we are not paying for the ACMA to protect and preserve our spectrum privileges, we will eventually lose them as the big Companies and Carriers will pay a fortune for spectrum space.

If we are not paying anything for this privilege you can guarantee over time to lose access to parts of the spectrum that we now currently hold. I personally think this is the biggest threat of going to a classed based license.

Type Approved Equipment

In the past a class based licence has meant that only "Type Approved Equipment" could be used by these operators. Eg Aircraft, Marine and CB band operators. Does this mean we will no longer be able to build, repair, modify and experiment with our own equipment. Now I don't know about you but I would be devastated if I can't legally build, repair or modify my own equipment. I would probably leave the hobby.

Call Sign for Life

What call sign for life really means is a call sign for eternity, that is call signs will never get released back into the pool as Amateurs leave the hobby or pass away. Because there is no requirement to renew the licence, it will stay with that operator forever. So forget about that sacred 2 letter NSW call sign that you have been dreaming about, unless you already have one that is.

Other countries that have implemented similar Class license systems such as England and Canada have already had exactly this experience.

No actual license Issued

Amateurs will be issued with a call sign by AMC for life - not a physical license, so you can't apply for things like Echo-link accounts and DMR-ID's that require proof of license. International license applications will also be an issue.

The AMC will have to maintain the Call Sign Database

If the AMC has to maintain the call sign database you can guarantee they will eventually ask to be reimbursed to do so, thus the re-introduction of fees without any benefits to Amateurs.

Future Changes to the Class Licence

The Class License is a different legal instrument than an Apparatus License, in that a Class License the ACMA can change the rules and conditions at will without the consultation of the license users. Whereas the Apparatus License requires the ACMA to consult its license holders on any changes of rules or conditions that effect their operation.

The bands could become unruly

If the ACMA is not going to regulate the Amateur Bands at all; it could become a “free for all”, with pirates and rogue operators seizing the opportunity to run amuck with no apparent consequences. Again this has been the experience in Canada and England who have implemented a similar class licensing system for their Amateur Radio operators.

My Conclusion to the Proposal

Again I would like to thank the ACMA for listening to my comments on the Proposal Paper.

My final thoughts are that **Option A: “Keep the existing apparatus licensing arrangements” is the best option of the ones supplied.** Option B may have been seriously considered if the LCD had been detailed out.

But Option C - I consider as a great threat to the Australian Amateur Radio community as detailed in my concerns supplied above.

Yours Respectfully

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