

The Manager
Spectrum Licensing Policy Section
A.C.M.A.
PO Box 13112
Law Courts
Melbourne Vic. 8010

Dear Sir / Madam ,

Ref. ACMA Proposed changes to amateur licensing arrangements 2021

Submission for consideration in support of option (A)

In line with current government policy the ACMA has proposed to move amateur radio licensing to class licensing to reduce cost and work involved in administering the legislation , this in its self an administrative exercise to modernise and simplify the legislation, but in doing so should not change the original intent of legislation .

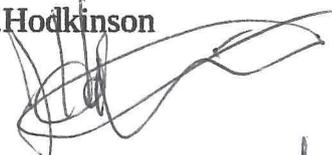
ITU region 3 spectrum plan allocates spectrum spaces to amateur radio as Primary and Secondary defined users , ITU article S25 RR No.5.8.28 – 31 defines the provided levels of protection provided , ACMA currently uses ITU footnotes to restrict and reduce our access to amateur allocated spectrum space .

ACMA proposed options (B & C) would remove the current provided protection from interference , this would appear to conflict with ITU regulations combined with the removal of mandatory operating conditions , together with the removal of monitoring of the amateur spectrum which conflicts with ACMA's statutory responsibility of spectrum management .

ACMA has not presented a constructive case to the amateur society for a change to class licensing conditions , the draft class legislation presented just does not apply to amateur radio simply by its nature of operation and structure , since amateur radio is a global society there should not be any changes of australian spectrum management that could have a impact on the rest of the world's amateurs , this would not be acceptable .

Yours sincerely ,

J.Hodkinson



Dated. 3 march 2021

Postal

11 Burge Place
Warilla NSW 2528