

[REDACTED]

From: ACMA Customer Service Centre
Sent: Monday, 31 October 2022 2:53 PM
To: Spectrum Licensing Policy
Subject: [SEC=OFFICIAL] FW: Radiocommunications (Amateur Stations) Class Licence 2022 Concerns [Ref: CSC2022-25377] CRM:001316024381

Hello,

The Customer Service Centre (CSC) has received an enquiry that requires an expert response to the customer from your section.

The CSC has informed the customer that their enquiry is complex and that your section will be responding to their enquiry.

Please reply to the customer's enquiry and carbon copy (cc) the CSC into your response and the CSC will finalise the end-to-end process.

Otherwise click on the hyperlink link below to enter the date and time the enquiry was resolved by your section to finalise the end-to-end process. If the hyperlink does not work, please reply back to the CSC and we will finalise the end-to-end process for you.

- **Required Action:** Concerns over amateur class licence
- **Email Address:** [REDACTED]
- **Interaction**
hyperlink: <http://crm.internal.govt/ACMA/main.aspx?etc=10075&extraqs=formid%3d16e0f738-d41e-4e58-84d5-8aff5fe3b632&id=%7b93A8AC21-CF58-ED11-80FC-D9BAC8A0A396%7d&pagetype=entityrecord>>

If your area is not responsible for this line of enquiry, please notify the CSC immediately by reply email and suggest an appropriate line area.

Kind regards

Amanda
Enquiries Officer
Customer Service Centre
Telephone: 1300 850 115
Email: info@acma.gov.au

----- Original Message -----

From: Simon Templar
Received: Mon Oct 31 2022 01:32:18 GMT+1100 (AUS Eastern Daylight Time)
To: ACMA Customer Service Centre; CSC CSC; CSC CSC; Glenn Dunstan; Mail Delivery System; Minister.rowland@mo.communications.gov.au; RADIO AMATEUR SOCIETY OF AUSTRALIA INC; svc_crm c2c_prod; System Contact
Subject: Radiocommunications (Amateur Stations) Class Licence 2022 Concerns

I have several concerns over the Class licence draft document.

Section 7

(7) The Call Sign Entity may cancel an assignment of a call sign to a person.

I believe the Call Sign Entity should NOT have the power to cancel a callsign, a PRIVATE entity having the power to revoke callsigns is a slippery slope giving them unprecedented powers.

(8) Cancellation of the assignment of a call sign to a person must be consistent with:

(a) the Radio Regulations; and

(b) if the ACMA is not the Call Sign Entity – arrangements entered into under subsection (10).

(9) Before cancelling the assignment of a call sign to a person, the Call Sign Entity must have regard to any policies published by the ACMA on its website that relate to the cancellation of the assignment of a call sign.

(10) The ACMA may arrange for a person to assign call signs, and to cancel assignments of call signs.

A PRIVATE callsign entity is NOT a REGULATORY body and should NOT have such powers, if there is a reason to cancel a call sign the ACMA being the REGULATORY body should be the only means of cancelling a callsign.

(14) For the purposes of this section:

(a) the ACMA is taken to have entered into arrangements with the University of Tasmania, as represented by its institute, the Australian Maritime College, for the University of Tasmania to assign call signs, and to cancel assignments of call signs, under subsection (10); and

(b) the deed between the Commonwealth of Australia and the University of Tasmania, as represented by its institute, the Australian Maritime College, which commenced on 18 February 2019, is taken to be the arrangements entered into between the ACMA and the University of Tasmania.

Note: Subsection (14) means that, at the commencement this instrument, the University of Tasmania, as represented by its institute, the Australian Maritime College, is the Call Sign Entity.

Why is the AMC even mentioned in this DRAFT class licence document, 1 Obviously the ACMA have already made the decision to palm off Call signs to the AMC, 2 If at a later date the ACMA decides to transfer this contract to another entity they will have to completely rewrite the Class Licence!

I also have grave concerns at what cost having the AMC as the callsign entity, with thier current charges of around \$79 per year for the 2x1 callsigns if they decide to apply the same fees on all callsigns is MORE EXPENSIVE than we already have now.

As far as I am concerned I have a contractual agreement with the ACMA and NO private entity and as such will NOT recognise the AMC if they decide to bill me for my exsisting callsign. I will refuse to pay a yearly fee to the AMC just to maintain a excel spread sheet like they currently do for the 2x1 callsigns, I will continue to operate my station as VK3XEM.

My understanding was that the class licence was to have meant no more licence fees but with a callsign entity which the ACMA have obviously chosen AMC for will mean ongoing costs, possibly in excess of current charges.

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The views I present are that of my own and NOT of any organisation I may belong to.

73 de Simon, VK3EM.