

# Proposed amateur class licensing arrangements and higher power operation - consultation 31/2022

## Response from Graham Alston VK3GA

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### Migration to Class License

I would endorse the migration of the existing amateur apparatus licence (LCD) arrangements for non-assigned amateur radio licensees to the new proposed amateur class licence (LCD) instrument on condition that:

- A public register is created and maintained that at a minimum contains:
  - issued callsigns,
  - associated qualifications and
  - renewal dates

This must be mandated by ACMA as something to be provided by the 'call sign entity' defined for the purpose of managing the issue of callsigns.

**This is probably the most important issue that needs to be addressed.**

- The categorisation of "EME low Risk stations" is un-necessary and too vague and should be removed. For example, amateurs use many different antenna configurations, some beginning at ground height but extending to a greater height. Trying to define a category based on such parameters is too problematic.
- ACMA commit to providing suitable individually tailored documents on request that can support of Australian amateur radio operators accessing town planning services and Australian amateurs seeking access to reciprocal licensing in overseas countries
- Callsign allocation limits are imposed: up to 4 permanent callsigns
- Part 1 Section 7 reworded from "may" to "shall" assign a callsign

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### Higher Power for AOCP(A) Operators

I believe this should be separated from the Class license Consultation and treated separately as clearly the ACMA are concerned about public health and this should not hold up the Class license migration.

I believe ACMA are being too conservative regarding the public health risk, as many countries, including NZ, allow higher power in both residential and rural areas with no restrictions. However since ACMA are clearly concerned about this, I would like to see rural stations receiving immediate permission with no restrictions on HF, and residential stations restricted to HF initially, and having to provide appropriate self-assessed ARPANSA RPS-S1 compliance.

The proposal to only allow higher power through a scientific license is too costly and effectively makes higher power unattainable for general HF use.

I believe the power level should be 1.5kW pY for all modes at all times on HF.