

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

25 November 2022

Dear Sir/Madam

Thank you for the opportunity to respond to the *Proposed amateur class licence and considerations for higher power operation consultation paper* September 2022. Below please find my responses to the questions asked by the ACMA within that paper.

Question 1

Do you see any reason for not extending secondary user access to the 50–52 MHz band for Standard amateurs? If yes, what is your reason?

I support the proposal by the ACMA to make the 50-52 MHz band accessible to Standard (AOCPS) radio amateurs, including the ACMA making associated changes to the existing amateur LCD to give early access for Standard amateurs to the 50-52 MHz band and remove associated restrictions ahead of access being provided under the class licence.

Question 2

What are your views on the proposed policy on call sign transfer?

I support this proposal, but believe that three months should be allowed for call sign transfer.

Question 3

Will the proposed 'regular check' – to confirm whether a person is still using their call sign – be a sufficient method of ensuring there are enough call signs (in combination with other factors, for example, the high number of available call signs, deceased amateurs, most amateurs only wishing to hold one call sign)?

I support this proposal, but believe a check should be carried out every two years.

Question 4

What are the benefits or disadvantages of our proposal not to limit the number of call signs that may be assigned to a person?

I do not support individuals or entities holding multiple callsigns.

Question 5

Do you have any concerns with the other proposed call sign management arrangements? If so, what are they?

I do not have any concerns with the other proposed call sign management arrangements.

Question 6

In the absence of amateur and station information being contained in the Register of Radiocommunications Licences, are there any amateur-operated registers or other existing voluntary registers that you would use?

I would recommend QRZ.com – the world's largest register of amateur radio operators that contains 99% of all amateur callsigns worldwide.

Question 7

Do you anticipate any difficulties operating your station in Conference of Postal and Telecommunications Administrations signatory countries?

No.

Question 8

What are your views on the proposal to allow Advanced amateurs to apply for assigned scientific licences for certain experimentation uses, such as reflecting signals from a celestial body as well as inter-continental ionospheric and trans-equatorial propagation experiments? (See section 6.)

I do not support this proposal.

Question 9

Noting the proposal mentioned in 8, are there other amateur experimentation uses that require higher power that you think should also be considered under assigned scientific licensing arrangements?

Refer response to question 8 and 11.

Question 10

What are your views on the medium-term proposal to allow Advanced amateurs to apply for authorisation for other higher power use-cases under certain conditions? Please provide brief information to help us understand your view.

Refer response to question 11.

Question 11

Is a 1kW power limit appropriate? Why or why not? If not, what alternative do you propose and why?

I do not support a 1kW power limit for Advanced (AOCPA) radio amateurs **under any circumstances**. My reasoning is as follows:

1. There is an extremely high risk of dangerous EME impacts on both humans and animals in built up residential areas and also an extremely high risk of severe, additional electrical interference
2. Some Advanced amateurs around Australia running 400W have already been heard talking over other amateurs and hogging international DX contacts on various frequencies in various bands, deliberately using their significant current power advantage over other amateurs with lower power limits.
3. A 1kW power limit for Advanced amateurs will be detrimental to Standard and Foundation amateurs and will make the current situation as per point 2 above, more than twice as bad as it currently is. A situation where Advanced radio amateurs would get a 600W increase in power limit and Standard and Foundation amateurs would get no increase in power limit is unfair and inequitable and cannot be allowed to happen. **If Advanced amateurs are to be considered by the ACMA for a higher power limit, so too should Standard and Foundation amateurs also be considered by the ACMA for higher power limits. Any such higher power limits should be modest and above all, safe.**

With the above in mind, I would instead propose modest and safe increases in power limits for **ALL licence classes (Advanced, Standard and Foundation)**, that maintains the current status quo as per the following table:

Licence Class	Current Power Limit	Proposed Power Limit
Advanced	400W	500W
Standard	100W	200W
Foundation	10W	100W

The above proposed power limits deliver a modest and safe 100W increase in power for Advanced and Standard licence classes and a modest and safe 90W increase in power for Foundation licensees.

I would remind my Advanced radio amateur colleagues that the hobby is not all about them and their apparent need for a 1KW power limit, with the intention of guaranteeing overseas DX contacts. Such thinking is selfish and is contrary to the spirit of Amateur Radio and the randomness and unexpected nature of propagation.

Foundation and by default, Standard licensees both existing and new are the future of our hobby. For the WIA and RASA to not propose and recommend to the ACMA that power limits for Foundation and Standard amateurs also be increased (when they are pushing for a 600W increase in power limit for Advanced amateurs) is insulting to Foundation and Standard amateurs, makes no sense and confirms that the WIA and RASA are advocating for Advanced amateurs only on the issue of increased power limit.

While I applaud the ACMA's proposed class licence and associated legislation, the fact that the issue of modest and safe increased power limits (eg: such as I have suggested), for **ALL licence classes (Advanced, Standard and Foundation licensees)** has not been considered as part of this consultation, is regrettable. I would very much like to see a future consultation paper from the ACMA specifically dealing with the power limit issue regarding **ALL licence classes** and inviting feedback accordingly. Until that time, the existing power limits for each licence class should remain in force.

Question 12

Are there particular bands that you consider should or should not be able to be accessed for Advanced amateur high power operations? Which band(s) and why?

Refer response to question 11.

Question 13

What use-cases would require stations to operate at power limits for Advanced amateurs higher than the 400W currently permitted?

Refer response to question 11.

Question 14

For each use-case mentioned in 13, please briefly answer:

1. Why is a higher power limit needed?
2. What are the specific limitations of the current power limit?
3. What power level is required?
4. What is the technical description of this power level requirements (for example, transmitter output power, emission mode)?
5. What amateur service frequency bands would be used?
6. How often will a higher power level be required?
7. What is the location of the station?

Refer response to question 11.

Question 15

Should potential higher power authorisations be limited by location, position, event or something else?

Yes. Refer response to question 11.