

To: ACMA

From: Peter Ellis VK1PE

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

I respond to the ACMA Consultation **31/2022** in the following terms:

I thank ACMA for the opportunity to consider its Consultation paper 31/2022, that shows the attention to previous consultations and submissions by Amateur organisations (WIA, clubs, etc).

General: I am in general agreement with the response to this Consultation made by the Wireless Institute of Australia (WIA). My specific responses should all be read along with the WIA response.

Consultation question 1:

Advanced amateurs already have secondary user access to the 50–52 MHz band.

Do you see any reason for not extending secondary user access to 50–52 MHz for Standard amateurs?

A: No

Consultation question 2:

Currently, a call sign is transferred by the transfer of the apparatus licence. We are proposing a process where the person with the assigned call sign surrenders that call sign, and nominates a new person to whom it may be issued. That new person will have one month in which to apply and pay for the call sign to be assigned to them. What are your views on the proposed policy on call sign transfer?

A: I agree with the transfer proposal.

Consultation question 3:

We are proposing that the call sign entity, under an arrangement with the ACMA, would conduct a 'regular check' to confirm whether a person is still using their call sign. Will this 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)?

A: I agree with the 'regular check' proposal.



Consultation 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?

A: I see **no issue** with a person holding or managing more than one callsign.

Consultation question 5:

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

A: I make **no response**. See the WIA position.

Consultation question 6:

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

A: **Yes**. I would also submit general details to a non-ACMA register.

Consultation question 7:

Do you anticipate any difficulties operating your station in CEPT signatory countries?

A: **No**

Consultation 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?

A: Such applications should be **'normal' and 'allowed'** when appropriate EME conditions can be met by calculation or other demonstration.

Consultation question 9:

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

A: Certain point-to-point communication methods or ionospheric reflection methods may require EME conditions that require considerable power or the aimed power may exceed EME levels normally considered to generate adverse conditions for a person entering the radio field. There are already adequate rules and controls over the use of these techniques and the areas within which such power levels are used, that can be invoked within license conditions.



Consultation 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.

A: **Yes**. However, allow exceptions by application.

Consultation question 11:

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

A: Yes. However, allow exceptions by application.

Consultation question 12:

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

A: I make **no response**. See the WIA position.

Consultation question 13:

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

A: Certain commercially available transmitter/amplifier modules come in power denominations that do not neatly multiply up to 400W, eg 125W x 3 = 375W, but 125W x 4 = 500W. It may be electrically simpler to combine 4 modules rather than 3, hence a request for a 500W limit may be arguable.

Consultation question 14:

For each use-case, please briefly answer:

- a. Why is a higher power limit needed?
- b. What are the specific limitations of the current power limit?
- c. What power level is required?
- d. What is the technical description of this power level requirement (for example, transmitter output power, emission mode)?
- e. What amateur service frequency bands would be used?
- f. How often will a higher power level be required?
- g. What is the location of the station?

A: I make **no response**. See the WIA position.



Consultation question 15:

Should potential higher power authorisations be limited by:

- location?
- position?
- event?
- something else?

A: I make **no response**. See the WIA position.

Peter R Ellis VK1PE,

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