

SUBMISSION TO ACMA ON DRAFT AMATEUR RADIO CLASS LICENCE

From:

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Consultation questions

1. Do you see any reason for not extending secondary user access to the 50–52 MHz band for Standard amateurs? - **No objection**
2. What are your views on the proposed policy on call sign transfer? (See section 4.)
Call signs are like number plates for motor vehicles, ABN numbers for businesses or licence numbers for tradespeople. They give assurance that the station is legitimate and allow bona fides to be checked.
Amateurs do not like the possibility that they could be communicating with a 'pirate' or 'bootleg' station as this places them in legal jeopardy. They also want to be able to report on bad behaviour. A third party call sign register does not have the authority of a government agency.
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)? (See section 4.)
This depends on how regularly is 'regular' and what form the check takes?
The present annual renewal of a licence is able to find amateurs who have deceased or abandoned the hobby. If a licence check is conducted by a third party other than ACMA, then cost factors push them to sporadic or random checks, with the possibility of allowing the illegitimate use of call signs.
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? (See section 4.)
There are few occasions where an amateur needs more than one call sign; the operation of a repeater or remote or experimental station would be the only occasions that come to mind.
Call signs are like number plates for motor vehicles and like them, there are vanity call signs. Allowing amateurs to amass multiple call signs would lead to 'callsign squatting' where vanity call signs are grabbed and resold. Bestablioshing a market for call signs is against the spirit of amateur radio and possibly in breach of international agreements.
5. Do you have any concerns with the other proposed call sign management arrangements? If so, what are they? (See section 4.)
See response to 2 above.
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? (See section 5.)
The existing internet registers rely on amateurs self-reporting or are derived from government registers. In the absence of a government register they would become

increasingly unreliable.

7. Do you anticipate any difficulties operating your station in Conference of Postal and Telecommunications Administrations signatory countries? (See section 5.)

Impossible to answer this in the absence of any clue from other administrations.

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.)

While there is a case for high powers for celestial reflection experiments (the proposed 'Venusbounce' and 'Marsbounce' for example), there seem to be few other cases.

Inter-continental ionospheric and trans-equatorial propagation is already being investigated at low powers (often less than one watt) by new digital modes such as WSPR, JT8 and others reported on by reverse beacon sites and the PSK Reporter. These are very popular modes and there are often periods when the bulk of amateur radio transmissions are in the new digital modes.

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? (See section 6.)

It is possible that some might arise in the future but these should be dealt with on case-by-case basis.

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. (See section 6.)

Given the power limits a '100 Watt' station would face in suburbia, only amateurs on large rural blocks could consider higher power.

11. Is a 1kW power limit appropriate? Why or why not? If not, what alternative do you propose and why? (See section 6.)

This document's concentration on higher power modes appears to be the result of lobbying by a subset within the hobby and it obscures the increasing activity at lower levels.

A quick look at the newest transceivers for the amateur market shows the majority are for 20Watts or less, even as low as 5Watts. Some examples are – Yaesu FT-817 and 818, CommRadio CTX10, Elad FDM-Duo, Elecraft KX-1, KX-2 and KX-3, uBitx, Icom IC-705, SGC SG-2020, Xiegu X5105, G90 and G1M – but there are more from smaller manufacturers.

The '100Watt' transceiver which was a standard purchase in the 1970s to 1990s now weighs in at \$5,000 or more. They are superbly engineered but beyond the reach of most amateurs. There are contradictions in ACMA's policy on low powered transmissions. ACMA seems to be happy with mobile users such as couriers and taxis using 25Watt transceivers without risk assessment and both UHF and 27MHz CB use 5Watts or lower can be sold as children's toys, but amateurs operating at low power find themselves under onerous conditions. Interestingly, many of the low power transceivers listed above come, or can be retro-fitted, with 'integral antennas' as specified in the 'Application of Radiocommunications Standards to Amateur Equipment'*.

The policy of amateur stations having an antenna at least 10m above ground is proper for stations of 25w to 100W, but is inequitable for lower powered stations when other services do not have to comply.

**The EME standard in Schedule 4 to the Equipment Rules applies to a device that, among other requirements, is a mobile station and has an integral antenna – an antenna that is either permanently attached to the device, or designed to be directly attached to a fixed connection on the device, without the use of an external cable.*

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? (See section 6.)

No comment

13. What use-cases would require stations to operate at power limits for Advanced amateurs higher than the 400W currently permitted? (See section 6.)

No comment

14. For each use-case mentioned in 13, 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 requirements (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?

15. Should potential higher power authorisations be limited by location, position, event or something else? (See section 6.) Please provide details to support your answer.

See above.