



The Radio Amateur Society of Australia inc.
BEING HEARD IS IMPORTANT
vkradioamateurs.org



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

Via email: to spectrumlicensingpolicy@acma.gov.au.

Re: Proposed amateur class licence and considerations for higher power operation Consultation paper

Dear Sir/Madam,

Please find enclosed RASA's response to the Proposed Amateur Class Licence and Considerations for Higher Power Operation Consultation Paper, dated September 2022.

If further clarification is required, please contact us.

Yours Faithfully,



Paul Anslow VK2APA
President
On behalf of the Radio Amateur Society of Australia

28th of November 2022



**The Radio Amateur Society
of Australia**
vkradioamateurs.org

The Amateur Radio Society of Australia Inc. (RASA)

Response to the

Proposed Amateur Class Licence and Considerations for Higher Power Operation Consultation Paper

Dated October 2022

Version 1.6

Foreword

The Radio Amateur Society of Australia (RASA) wishes to thank the ACMA for the opportunity to provide a response to the *Proposed Amateur Class Licence and Considerations for Higher Power Operation Consultation Paper*, dated September 2022.

RASA attempted to work on a collaborative response with the WIA but was unsuccessful. Our efforts to work together were ignored. It remains our position that a united and consistent response from the sector is the best approach.

Consultation Questions with Answers

Since the announcement of the ACMA's intention to bring in Class Licencing in January 2021, RASA has been in regular consultation with the Australian Amateur Radio community, via email, QTC magazine and club presentations.

Our responses are a result of those interactions.

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? (See section 3.)

Response

RASA is in support of the proposed arrangements. The current anomaly serves no practical purpose for Standard Licensees and presents unwarranted limitations in frequency agility.

In December 2019, RASA conducted an open survey in which 71% of respondents were in favour of this proposal.

Question 2

What are your views on the proposed policy on call sign transfer? (See section 4.)

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?

Response

RASA is in support of the proposed arrangements.

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)?

Response

RASA supports proposed arrangements, with a check every three years seen as appropriate. Email should be the preferred protocol for contact. However, where traditional postal channels are preferred, these options must remain available.

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? (See section 4.)

Response

RASA does not support individuals or organisations holding multiple call signs without justification. There should be a limit (one) on the number of two letter suffix callsigns in the populous states (Vic, NSW, QLD).

There needs to be tight controls over the Australian External Territory callsigns (VK9 & VK0) as follows:

- Applicants must provide proof of residence or intention to visit for a fixed duration (e.g. proof of residence, holiday, work engagement, posting to an ANARE base, DXpedition, etc)
- On conclusion of any temporary allocation, VK9 and VK0 callsigns should not be available for automatic renewal.

The details of this proposal would be discussed if accepted.

Question 5

Do you have any concerns with the other proposed call sign management arrangements? If so, what are they? (See section 4.)

Response

RASA's position is to enforce the existing callsign template state designators. (i.e. VK1= ACT, VK2=NSW, VK3=Vic etc).

RASA's consultation with the Amateur Radio community indicates that the majority wish to retain and enforce the existing template state designators. State designators have been in place for over 90 years and are a well-understood protocol, both locally and internationally for identifying a station's home state or general location.

State designators VKØ - Antarctica, Heard Island, Macquarie Island and VK9 - Cocos (Keeling) Island, Mellish Reef, Willis Island, Norfolk Island, Lord Howe Island and Christmas Island hold significant importance to local and overseas amateurs due to their limited activation and recognition as unique DXCC Entities (in Amateur Radio parlance, they are effectively separate countries).

To date the sector has managed to protect the VKØ and VK9 State designators from inappropriate use. Our consultation with the Amateur Radio community demonstrates strong views that the VKØ and VK9 State designators remain protected.

RASA supports the proposal by Garry Page (VK3ZGP) that the VJ and VL prefixes be released for two-letter suffixes for Advanced Licensees. This change to the callsign template has precedence (2x1 Contest Callsigns) and would address the lack of supply for two-letter suffixes in the populous states (VK2, VK3 and VK4).

In implementing such a policy, we would recommend grandfathering any existing arrangements whereby a station's callsign does not align with the existing template (we understand this will have occurred where an operator has moved interstate and opted to retain his/her existing callsign).

Management of operating procedures

Operating procedures assist Australian Amateur Radio operators to understand and comply with sector defined operational protocols. There is also a need for a definitive reference to allow amateurs to study for the Regulations Exam.

Will future Regulation and Practical Assessments include operational procedures? The only up-to-date readily available resource is <http://vkregs.info>.

It is RASA's position that either the ACMA or an apolitical third party (e.g. AMC) manage Amateur Radio operating procedures. The most appropriate delivery platform would be the web.

Proof of authorisation and callsign ownership

There is a need to access a licence document with the assigned callsign(s). RASA recommends that ACMA or its service provider issues an appropriate document (PDF) that includes the amateur's name, callsign and class of licence (similar to the PDF issued by the ACMA RRL today).

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? (See section 5.)

Response

There are several opt-in on-line registers on the internet.

Examples include:

- <https://www.vkham.com/features/vks-on-the-internet>
- <https://www.qrz.com/>
- <https://www.qrzcq.com/>
- <https://hamcall.net/call>
- Some amateurs choose to use a dedicated club listing.
- Some amateurs have their own dedicated web pages.

RASA found that there are differing viewpoints but no consensus:

- Some amateurs believe that there should be a publicly accessible list of allocated call signs available with the existing level of detail. No change.
- Some amateurs support a version of the publicly accessible list but with limited personal details including only the callsign and licence class.
- Some amateurs believe in the choice to opt out of the versions above.

RASA's position is that an online database be maintained by the ACMA or its contracted callsign administrator that contains the callsign and licence class. This solution protects individual privacy concerns whilst providing a verifiable source of callsign provenance.

For example: VK0XXX Advanced

It is RASA's position that this solution would satisfy the majority of Australian Amateurs. More information is provided in our Discussion Paper on the Issues of Protection from Interference and an On-Line Database of Callsigns - Class Licencing, dated the 23rd of May 2022.

Question 7

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

Response

RASA believes this will not be an issue if ACMA provides appropriate (CEPT compliant) documentation to Australian Amateurs.

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.)

Response

RASA does not support the proposal. The use of assigned scientific licences for the Amateur Radio Sector is impractical for amateur radio and adds unnecessary burden for all concerned. Existing Amateur Radio legislation and licensing provides an adequate framework for higher power.

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? (See section 6.)

Response

Please refer to our 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. (See section 6.)

Response

Please refer to our 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? (See section 6.)

Response

Higher power will permit experimentation, a level playing field with international standards, as well as an improved capability to communicate when propagation conditions are poor.

Many Amateurs already operate with higher power. RASA believes that an increase of power for Advanced licensees as follows:

- 1kW (pX) for SSB with modulation of ~25% duty cycle in transmit,
- 1kW (pZ) for CW with morse code, up to ~44% duty cycle in transmit,
- 250W (pY) for AM, FM and Digital modes with 100% duty cycle in transmit

is appropriate for MW, HF and VHF. The station must comply with the requirements specified in the LCD relating EMR and EMC. We propose that Amateurs higher power operation be on a non-interference basis.

Note - RASA is currently investigating the potential to increase power for Standard and Foundation licensees.

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? (See section 6.)

Response

RASA's position is that high power be permitted on all MF, HF and VHF bands. Please refer to our 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? (See section 6.)

Response

Please refer to our response to Question 11.

Question 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?**

Response

Please refer to our response to Question 11.

Question 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.

Response

No. Please refer to our response to Question 11.