

Submission by Roland Turner in response to ACMA's proposed amateur class licensing arrangements - consultation 31/2022

Background

I am an Australian citizen resident in Singapore. Although I received my AOLCP and a limited license in Australia in the '90s (call sign VK2ZRT, expired long ago), my operation in Australia in recent and likely future years is under the visiting amateur privileges on the basis of my Singapore license (call sign 9V1RT). I have done so approximately annually for the last several years and intend to continue to do so for the foreseeable future, in a variety of modes and locations but particularly low-power mountain-top operation in Kosciuszko National Park. As I have operated during visits to Australia over the last several years on the basis of a class license I am perfectly comfortable with continuing to do so, and I commend the decision to use a unified class license for resident and visiting radio amateurs, rather than risk unnecessary inconsistent conditions for the two groups.

I largely support the positions set forth in WIA's November 14 exposure draft of its response to this consultation. In the interests of minimising the burden of considering redundant submissions, and assuming that WIA's position hasn't changed significantly in the last fortnight, I comment here only where my view expands on or contradicts WIA's.

EME regulatory arrangements

I commend the inclusion of relevant international standards, particularly the freely-available IEEE C95.3, having gone through the rigmarole of accessing 2772 via the NSW State Library, difficult for an overseas resident in particular because online access to standards is no longer available from the NSW State Library, nor the Australian National Libraries.

I also commend the inclusion of the reduced burden for "Level 1" low-risk stations. I propose the addition to 9(1) of an additional set of low risk station criteria for low power stations, e.g. as 9(1)(d):

the average total power supplied by the transmitter to all antennas fed by the transmitter is not more than 10 W

This addition is motivated by my mountain-top use, which employs a 5 W transmitter on the 20/40 m (14/7 MHz) bands, a "squid pole" (7 m tall collapsible fishing pole) and a 10/20 m of wire as an antenna. The 9(1)(a) criteria don't apply in this case because an antenna on an open area on a summit is manifestly not "inaccessible to a member of the general public". The 9(2) mobile criteria

don't apply because the antenna is not integral. The primary risk mitigation is the very low power in use. In the alternative, an additional requirement that:

the operator have the antenna in sight at all times, discontinue transmission immediately if a member of the public approaches the antenna, and not employ automatic or computer-controlled operation.

would also be feasible.

I am not able to estimate how many other licensees in Australia operate in a way which this would address, but I'd point out that battery-powered operation of stations that can be readily carried (e.g. in a daypack) is sufficiently popular amongst radio amateurs worldwide that the the term QRP is used to refer to it.

Consultation questions

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

Yes.

The call sign entity should be required to provide registrants with the means to demonstrate to third parties that they are the authorised registrant of a particular call sign. Suitable mechanisms include:

- An obligation for the call sign entity to issue upon registrant's request a certificate in electronic form (e.g. a PDF) certifying the identity of the registrant and their right to use the call sign (preferable).
- An option for a registrant to require that the call sign entity include their identity in a register published by the call sign entity (potentially problematic given contemporary privacy norms).

In addition to the cases listed by WIA, this is important to amateur licensees seeking to use Internet-connected stations in other jurisdictions, both stations with full remote control and those that just link to an repeater (e.g. EchoLink). In most cases, the operator will want to sight — or want to know that someone credible has sighted — evidence of the user's right to operate as an amateur and with a specific call sign. If Australian radio amateurs lose the ability to demonstrate their legal entitlement to the use of a particular call sign, the simplest solution for such stations will be to deny Australian licensees any access at all. This would appear to be an undesirable outcome.

ITU RR matters

While I support removing regulatory involvement aspects of operation that don't require it, I suspect that proposal has gone slightly too far with respect to the phonetic alphabet, the use of which is mandated by RR 57.7 for all radiotelephony (i.e. without limit to specific services):

When it is necessary to spell out certain expressions, difficult words, service abbreviations, figures, etc., the phonetic spelling tables in Appendix 14 shall be used.

I'd suggest that wording to this effect be included in paragraph 13 of the Class License.