

Proposed Amateur Class Licence and considerations for Higher Power Operation Response

October 2022

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Introduction

At the following address is a Request for Consultation (RFC) document produced by the Australian Communications and Media Authority (ACMA):

<https://www.acma.gov.au/consultations/2022-09/proposed-amateur-class-licensing-arrangements-and-higher-power-operation-consultation-312022> (RFC 31/2022)

To be also noted is a previous RFC:

<https://www.acma.gov.au/consultations/2021-01/review-non-assigned-amateur-and-outpost-regulatory-arrangements-consultation-012021> (RFC 01/2021)

In this document I propose to address issues as requested under RFC 31/2022. Yet sentiment expressed in RFC 10/2021 cannot be ignored either.

General Comment

The sentiment of RFC 01/2021 from Amateurs was that approximately 800 submissions were against any changes to arrangements. Amateurs communicated quite clearly that existing LCD's and arrangements under <http://www.legislation.gov.au/Series/F2015L01113> were satisfactory.

It is to be noted that two of the handful of supporting arrangements were from reported Representative Bodies i.e. The Wireless Institute of Australia (WIA) and the Radio Amateur Society of Australia (RASA). Yet submissions from these agencies when read clearly came from a "Fait-Accompli" perspective – in that the ACMA's perspective that this was going to happen despite what the community had clearly communicated that it wanted.

This author had also put in a Submission that commented from this same perspective – and had also issued a supplementary submission that rejected some of the premises initially submitted.

The fact that RFC 31/2022 has been released with a focus on pushing against community concerns around "Class Licensing" clearly demonstrates the contempt for Amateur wishes and concerns demonstrated by The Agency towards the initial consultation process conducted in RFC 01/2021.

It clearly indicates that the ACMA has a complete lack of understanding of or a disregard for what Amateurs in the Australian Community really want – **that being active regulation**. Amateurs want standards on our airwaves to be maintained. We want our airwaves to be actively monitored – with acceptable protocols adhered to. The only way that standards can be maintained – if not improved – is through Active Regulation and Enforcement.

Without active Regulation and Enforcement – as well as mechanisms "with teeth" in Law to support Regulation and Enforcement – standards will decline. Many Amateurs are already observing and complaining about declines in standards on our Spectrum and the lack of enforcement mechanisms and willingness of the regulating agency to handle such concerns.

Amateurs that do not adhere to or openly flaunt recognised protocols and/or standards must have privileges for operating on Amateur-allocated spectrum revoked, suspended and/or face reassessment before they can resume operating on Amateur spectrum. As examples we must not have the foul language and bullying seen on Citizens' Band Spectrum migrating to Amateur Spectrum.

Standards are already noted to be declining – with the recent "VK3RBA Bullying Example" and Amateurs contracting callsigns on repeaters being easily recognisable events that can just be pulled out as examples quickly.

It is noted that many actions against Amateurs that have been reported to be in breach of protocols and practise have failed in the past – often at great frustration and expense to The ACMA. This author has in numerous communiques from the ACMA had the term "administrative burden" used by ACMA and Ministry Agents in communication when regulatory issues have been raised.

This indicates that legislative and regulatory mechanisms available to the ACMA are inadequate.

It is clear that the ACMA even by persisting with RFC 31/2022 are trying to distance themselves from Amateurs and Operators rather than acquiescing to their real needs – that being enforcement of Standards and protection of our allocated spectrum.

Amateurs actually want stronger regulatory mechanism in place. Rather than “divesting responsibility” and “self-regulation”, Amateurs really want and need active regulation that has teeth. Everyone knows that “deregulation” effectively means no regulation – and it ultimately leads to a loss of control and chaos. Approaches pushed by The ACMA appear are clearly centred on “deregulation” and divesting itself of interest in the sector.

This concern has been communicated to the Minister for Infrastructure, Transport, Regional Development, Communications and the Arts Communication in correspondence MC22-008163 – yet this and the intent of the communication has clearly been misunderstood.

At the time of writing there has been no return communication provided to concerns expressed to this Department.

Recommended Regulatory process

In previous communication I have recommended that a “Sector Steering Committee” needs to be convened to manage and make recommendations to ACMA. Such committees exist within other sectors (i.e. Land Mobile, Maritime).

Membership of this steering committee should be a by-invitation from ACMA. It should manage and make recommendations to ACMA on issues relating to this sector and perhaps CB Radio issues. It should also be responsible for overseeing assessment processes and the syllabi.

Non cooperative behaviour or “political blocking” – as observed in the recent “Syllabus Review Panel” – should lead to members being dismissed from this panel and more balanced and representative members of the Amateur (and perhaps CB community) cycled through this committee.

One of the key roles of this committee should be to make recommendations to The ACMA regarding evidence-backed complaints that emanate from within The ACMA itself and the General Community regarding Amateur Related and CB issues.

In previous communication I have identified that the Radiocommunications Act (1992) has provisions that allow for the reassessment of any licence at any time and effectively without reason. This should be the main management tool used. Using this approach would be legally sound and would not be subject to many of the failures that past regulatory efforts have met.

Reassessment does not necessarily mean re-test; reassessment can also be interpreted as to whether it is actually desirable for that licence (authorisation) to exist and can be purely administrative.

Reassessment of license(s) should be used as the primary tool for maintaining order on Amateur allocated spectrum i.e. A serious breach of Amateur protocols and/or The Radiocommunications Act (1992) is identified. The offender must be notified that a breach has been recorded, and is then offered 30-days in which to provide a response. The regulatory tool may include Reassessment via revocation of the licence – permanently and/or for a period of time and/or it may involve Reassessment via examination - at the offender’s expense. Examination reassessments could involve anything from a partial (i.e. Regulations only) to a full reassessment based on the severity and history of reports.

If no reassessment has occurred within 90 days then the qualification lapses and call signs go back into the pool.

Under existing provisions of the Radiocommunications Act (1992) Amateurs must then render all Amateur transmit capable equipment incapable of transmitting or surrender equipment to a suitably qualified person and/or The Regulatory Agency (i.e ACMA).

With a licence held under a “class arrangement” the availability of such mechanism for regulation may be reduced and/or eliminated. Such provisions must not be diminished in any regulatory process.

Summary

The clear outcome and intent conveyed in RFC 01/2021 should be noted; RFC 31/2022’s focus on a Class-Licensing arrangement should be largely abandoned.

Throwing out “medium to long term” carrots such as “High Power” and “free licensing” is just a whitewash.

The ACMA must have legislative elements in place that allow it to effectively enforce standards and protocols on Amateur Spectrum.

The ACMA must actively regulate and enforce. That is what Amateurs really want.

Consultation Questions

- 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 would support the arrangement of extending access to the largely underutilised 6m band.

The band itself is currently under-utilised.

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

There is currently quite an alleged background “trade” in callsigns. Some Amateurs are “hoarding” quite a number of callsigns – especially “2-letter” calls.

It must be illegal for there to be any financial gain for any estate or organisation for any callsign transfer. The penalty should be considerable.

All callsigns and the rights to callsigns must be owned by The Commonwealth. Allocation of a callsign to an individual or organisation should be effectively a “sublease” – a right-to-use.

With callsigns no longer being “owned” by The Commonwealth – delegated out to a third party – there is the potential for trade in callsigns to continue if not expand. A third-party agency may not have the same legislative protections to outlaw such trades.

- 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.)**

I would be in favour of this. I believe that the UK’s OFCOM currently requires such arrangements for UK Amateurs.

- 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.)**

I would not be in favour of this. A person should be able to hold say one 4-prefix call (legacy), one 3 prefix call and one two-prefix callsign in each State and/or Territory of the Commonwealth of Australia.

The issue is two-prefix calls. Only one Amateur/Organisation should be able to hold one 2-prefix call.

There are far too many Amateurs hoarding 2-letter calls.

The issue is fairness, openness and opportunity for others to be able to hold 2-letter calls.

I do accept the concept of being able to keep a callsign in reserve from a deceased operator; yet the period for which this can occur should not exceed 12 months. The callsign should remain in the name of the estate until the transfer occurs.

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

I have no concerns with a delegated authority maintaining and managing Callsigns.

Callsigns must be owned by The Commonwealth of Australia – with the right to use a callsign delegated to a particular organisation or individual.

The database of ownership of a callsign must also be owned by the Commonwealth of Australia.

The security of information contained within this database callsign right-of-use must also be the responsibility of The Commonwealth of Australia.

Not all 3rd-party maintainers current or in the future may have the capacity or compulsion to act to high security standards. Recent “hacking” and “online security” events in Australia highlight the importance of data security.

This must never change.

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.)

I cannot support AR Licenses being removed from the Register of Radiocommunication Licenses (the RADCOM Register).

Many nations will NOT ACCEPT ARRANGEMENTS unless they can be verified on formal Government Sites. Current proposals require that the register be maintained by a 3rd party.

This could therefore invalidate arrangements with other nations as the argument could be raised that the license is NOT with Government but with a 3rd party agency.

The Register of Amateur Licenses MUST STILL APPEAR ON AND BE ANNOUNCED ON ACMA RESOURCES if they are divorced from The ACMA register.

I recognise that various legal impediments exist with regards to 3rd party Non-Government-Agencies maintaining Data that is of official status ion Government registers.

The simplest and easiest approach with the least amount of “administrative burden” is therefore to leave all callsigns on The ACMA RADCOM register and retain direct management thereof through The ACMA and its resources..

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

As an assessor for Amateur Radio Licenses, I have had to remotely assess quite a number of Amateurs for Australian Licenses from outside our shores.

Many of these nations do not offer their license assessments in English; therefore, they recommend that prospective Amateurs that seek licenses in their English-speaking nation and then use various legislative arrangements to convert these licenses into local licenses.

One such example is the nation of Japan. I have had quite a number of clients come to me for assessment so that they can operate anything from full Amateur Stations to photography drones (which require Amateur licenses in Japan).

Many nations will NOT ACCEPT ARRANGEMENTS unless they can be verified on formal Government Sites.

Current proposals require that the register be maintained by a 3-rd party and advertised on their resources.

This may not be acceptable to overseas nations – and may require considerable “administrative burden” and cost to the ACMA to manage, maintain and update arrangements.

By far the best arrangement – with the least amount of burden and cost to the community - is to keep the Australian Licenses maintained on an Official Government Register maintained by an Official Government Agency.

- 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 have no concerns with this proposal.

Legislative and regulatory elements must recognise these “Scientific Licenses” with special privileges. Such licenses should be obvious to the AR Community (i.e. special Prefix Block).

Drafting such provisions could be expensive and require parliamentary time.

- 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 has long been acknowledged that activities such as “meteor scatter” and “moon bounce” communication on higher Amateur bands do require considerably higher power than is currently available to the Amateur Radio community.

Specific provisions – if not experimental licensing variations – should be available for such purposes.

Any variation should apply normal OH&S safety guidelines and should also comply with safety standards and EME exclusion zone as determined satisfactory by the ARPANZA agency.

Calculation software used by the Amateur community was maintained by a retired former now deceased ACMA Official Doug McArthur VK3UM(sk). This software is still available for download at

<https://www.wia.org.au/members/technical/emr/documents/VK3UM%20EMRCalc%20Ver%2007.12%20Install.zip> .

High-quality and approved software needs be maintained and approved by both The ACMA and ARPANZA for general community use. The current resource at <https://www.acma.gov.au/sites/default/files/2020-07/EME-calculator.xlsx> is far from comprehensive and inadequate except as a very basic guide for the community.

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.)*

This is currently bandied about by The ACMA and packaged with the “bullied-through” forgone conclusion that Amateur Licenses are to transition to a Class-licensed framework as a distraction.

There are many within the ACMA that, through personal interaction, have no interest whatsoever in granting higher power allocations to Amateur Radio Operators. There are also some within the Amateur Radio Community that represent us that were responsible for actually writing into legislation provisions that hamstringing increased power usage, when they worked for Government (ref: Presentation at EMDRC by Doug Macarthur in 2013 before his untimely passing).

This proposal has been bandied about for a long time – including through a much maligned and poorly administered High Power Trial that commenced on 1 March 2012 and concluded on 31 August 2013.

New Zealand has had a 1 Kw HF limit available to Amateurs for some time now.

The question must be asked – so why can’t Australian Amateurs have access to 1KW as well? The answer to this question basically is a fear of increased interference – especially to the NBN system (see: <https://www.nbnco.com.au/content/dam/nbnco2/documents/nbn-Amateur-Radio-guide-publication.pdf>).

There is also the odd-fear that there may be risk to The ACMA and Government at hands from noisy members of the community concerned for their own safety.

Many studies, including a recent literature review conducted by Dr. Andrew Smith VK6AS for the Amateur Radio Community and ACMA (at <http://vkradioamateurs.org/%EF%BB%BF1-kw-for-advanced-licences/>) found that there was no evidence that radiation at HF wavelengths in the proposed power levels proposed (i.e 1Kw Px) provided any appreciable risk to the community at large.

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

Many nations of comparable land-mass size, such as the USA, offer in excess of the proposed 1.0Kw Px for their Amateur Radio Communities. Such is offered on a non-interference basis.

The basic principle is that one should only use the required amount of power that is required to sustain reliable communication. That principle should be adopted here in Australia.

Based on Dr. Smith's literature reviews, there is no reason why Australian Amateurs should not have access to up to 1Kw Px. Based on similar nations-to-Australia's determinations, therefore there is no reason why up to 1.5 Kw on a non-interference basis and EME safety-exclusion limit should be considered acceptable.

The Amateur Radio is not united in its need for increased power; there are some that believe that "a better operator is one that can make a contact at a lower power level". These operators are somewhat referred to as "QRP Operators". Operators that use "higher powers" are often referred to as "QRO Operators".

Under the right conditions a station could in the past have been capable of working the world with only a few Milliwatts. Yet reports of such events occurring – even under good Ionospheric HF transmission and Reception conditions as there are at the moment – are exceptionally rare due to local noise and the poor noise immunity of much non-Amateur equipment now entering this country (and in fact the world).

There have also been huge increases in Defence HF radar systems.

As we live in far-away lands to most Amateur Operators worldwide, Australian Amateurs therefore need the availability of extra power to overcome local noise and external interference on our spectrum.

As for the "QRP Argument" – it has been my direct experience that "QRO is actually QRP's greatest Friend". QRP operators have this great fear that they are being swamped; yet it is actually the opposite. It is the QRO operator, from my experience, that makes contact with a QRP operator and therefore alerts other stations that a QRP operator is actually operating.

As for needing 1Kw of Px available – It is a necessity under the high-noise-low-quality-of-EME-circuitry in modern equipment environment which we live in.

As for whether the power level should be 1Kw or 1.5Kw – it should perhaps be considered to be homogenised with nations of approximate similar size such as the USA. Its good enough for USA Amateurs to have access to 1.5Kw in their highly litigious environment; therefore, it should be safe for Australian Amateurs to have access to the same.

This is all dependent upon transmissions be within safe EME levels as determined by ARPANZA.

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.)*

It is my belief, guided by Dr. Smith's Literature study, that HF-bands 30MHz and below are safe to use at power levels up to 1.5Kw Px. There is little differences in numbers and outcomes up to 1.5 Kw.

Yet above these frequencies the energy associated with transmissions is considerably greater.

I believe that power limits of up to 1.5 Kw should be permitted on Amateur Frequencies between 1.8 and 30 MHz.
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At frequencies above 30 MHz current power restrictions should apply based on community safety concerns.

All should be on a non-interference basis.

NBN FTTN/VDSL2+ interference should not be factored into interference equations. This technology was flawed before its implementation and such flaws were well known before it became commonplace in Australia.

Yet as I have indicated in earlier parts of this documentation higher power for specific needs on higher bands - within Amateur structures and protocols - should be available for activities such as meteor scatter and moon-bounce.

Application for such should be via affordable variation to The ACMA.

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

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?

Use-cases could include:

- **Working a reported rare HF DX station on a crowded band using SSB.**

One of the main aims of many Amateur Radio Operators that operate on HF is to work as many "Rare DX" (rare operational locations) and "DXCC" countries (countries which are counted as having been worked) as is practical on as many different bands as one can.

There is a mark – 100 confirmed DXCC "Nations" that the vast majority of Amateurs that work HF try to reach.

To be counted all contacts must be confirmed and verified. There are various tools and mechanism available to the Amateur Radio Community that are beyond the scope of this submission to detail.

The main aim is to work, log and confirm a contact. Having access to higher power increases the chances of and probability thereof of making and completing a contact on a particular Amateur band.

- a. *Why is a higher power limit needed?* To overcome the multitude of other signals trying for that station – many that are much closer, have much better propagation pathways and/or have access to much higher transmit power levels than Australian Amateurs have access to.

- b. *What are the specific limitations of the current power limit?* The power limits available to other nations (i.e. 1.5 Kw in USA, 1 Kw in NZ, 2.25Kw in Canada)
 - c. *What power level is required?* Comparable power limits to that available in other nations (see above) to “even the playing field”.
 - d. *What is the technical description of this power level requirements (for example, transmitter output power, emission mode)?* SSB (J3E)
 - e. *What amateur service frequency bands would be used?* Amateur HF bands below 30 MHz
 - f. *How often will a higher power level be required?* Every time a “Rare DX’ station is known to be or reported to be operating on a particular band. Amateur Radio Operators use “cluster” or reporting sites (i.e. <http://dxsummit.fi/#/>) to identify when stations are operating and on what bands they are operating. When tuning to these reported frequencies often “congestion” can be heard. To punch through interference and congestion – so that Australian Amateurs have a better chance of being heard and hence making that possibly rare contact.
 - g. *What is the location of the station?* Outside of Australian shores (“DX”).
- ***Working a known mobile station from a base station – reporting back their status and safety conditions – especially when operating in rural Australia.***

May Amateur Radio Operators like to go portable. Many also use Amateur Radio to report in to “Nets” – regular if not daily contact sessions – to report their progress, status and well-being.

- a. *Why is a higher power limit needed?* To overcome local noise and variations in propagation. It also can be used to “punch through” bad operating environmental conditions
 - b. *What are the specific limitations of the current power limit?* Power limits sometimes are inadequate for stations to reliably maintain two-way communication.
 - c. *What power level is required?* Under circumstances where there is signal fade or unreliable pathways as much power as is practical is required.
 - d. *What is the technical description of this power level requirements (for example, transmitter output power, emission mode)?* SSB (J3E)
 - e. *What amateur service frequency bands would be used?* HF bands below 30 MHz
 - f. *How often will a higher power level be required?* Every time one at a “base” location is working someone that is mobile or portable in order to reliably punch through interference and congestion – so that Australian Amateurs have a better chance of being heard and hence making that possibly rare contact. Local noise in urban areas is much greater than in rural areas.
 - g. *What is the location of the station?* Inside Australian shores (“DX”).
- ***Working a station during a high-interference event such as an overseas HF Radar or illegal operators operating on the same band.***

The use of High-Powered “Over-The-Horizon” RADAR systems – that allegedly are capable of defeating most current stealth technologies in Aircraft – has increased considerably. Such systems from overseas origins can intrude onto Amateur allocated spectrum.

Likewise there has been noted to be considerable increases in illegal and unqualified operators accessing our bands. The most common interference can be observed from alleged Indonesian Fishing Boat Operators on 40m early-morning and evenings.

- a. *Why is a higher power limit needed?* To overcome the multitude of other signals trying for that station or interfering with a station that an Amateur is trying to contact – many that are much closer and or have much better propagation pathways. To “punch through” the interference events emanating from beyond our shores.
- b. *What are the specific limitations of the current power limit?* The power limits available to other nations (i.e. 1.5 Kw in USA, 1 Kw in NZ, 2.25Kw in Canada). Some of these international HF stations use power in the MEGAWATT range – and their radar signals “intrude” into Amateur Radio-allocated spectrum.
- c. *What power level is required?* Comparable power limits to that available in other nations (see above) to “even the playing field”. Basically, as much power as is practical when such events occur.
- d. *What is the technical description of this power level requirements (for example, transmitter output power, emission mode)?* SSB (J3E)
- e. *What amateur service frequency bands would be used?* Amateur HF bands below 30 MHz
- f. *How often will a higher power level be required?* Whenever such interference is detected (often evenings) on Amateur bands: To punch through interference and congestion – so that Australian Amateurs have a better chance of being heard and hence making that possibly rare contact.
- g. *What is the location of the station?* Outside of Australian shores (“DX”).

Side benefit: National Security

- ***Allowing Australian Amateurs to use additional power also identifies vulnerabilities in technology to be identified and ironed out.***

It is known that Amateur Radio shares some spectrum with Defence Primary users (i.e. 70cm). By allowing Australian Amateurs access to higher power allocations is therefore identifies vulnerabilities that foes of this nation could exploit – simply - and therefore use against this nation to knock out key infrastructure.

If key infrastructure (i.e. The VDSK2 Network - can be rendered useless just with off-the-shelf Amateur equipment, then is affected technology of value to Australia? How better can issues with such technology be identified than with mostly “off the shelf” hardware?

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.*

Higher power authorisations should be available only to Advanced Amateurs.

Higher power authorisations should be automatic but based on non-interference and EMR safety compliance.

There should be no other restrictive practises at play; we must not create “elite elements” within our own community. There should be no “special amateur” that has “special rights”. Rights should be based on qualification. Rights should also be based on compliance with community standards.

The principle should be that you meet the standards then you have the ability to use. If you do not comply then you lose the ability to use or have it restricted.

Proposed Amateur Class Licence and considerations for Higher Power Operation: Supplementary Concerns

October 2022

Stephen Ireland
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Assessor for Amateur Radio Licenses

Introduction

At the following address is a Request for Consultation (RFC) document produced by the Australian Communications and Media Authority (ACMA):

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In this document I propose to address issues as requested under RFC 31/2022. Yet sentiment expressed in RFC 10/2021 cannot be ignored either.

This supplement to the additional submission raises concerns at the use of Amateur Radio Spectrum as it is used for the broadcasting of pre-recorded, widely distributed material.

Supplementary Comment

For some time now and in past submissions I have been raising concerns regarding the use of Amateur Spectrum for what is effectively uncontrolled Broadcasts.

I have no concerns with live-to-air presentations and “Nets” (as they are termed in Amateur Radio). My concern is pre-prepared, pre-recorded and wide-area-distributed “broadcast materials”.

I again must raise the circumstance of “commentary” rather than “reporting” being used on Amateur Radio Spectrum within the content of such broadcasts.

According to legal discussions that I have been a party to, commentary may not be covered by nor consistent with controls in place for other broadcasting medium.

Liability insurers may not be aware of risks associated with organisations sponsoring “broadcasts”.

In visionary lobbying on such matters – past and present – “agents” from both the Wireless Institute of Australia (WIA) and Radio Amateur Society of Australia (RASA) have spoken to me directly in the past regarding their lack of support for my positions.

It is my direct understanding that provisions were added into the last update of the LCD to directly counter concerns that I have raised.

I have raised concerns re the potential for inaccurate and possibly defamatory comment to emanate from such broadcasts – without direct controls being in place to deal with inappropriate broadcast materials being distributed.

I have also noted somewhat contradictory concerns being on various social forums – sometimes within broadcasts - from agents of both of these representative organisations. Many of these concerns I believe have made their way to the ACMA for regulatory discussion.

Provisions MUST be put in place in any LCD reform to ensure that pre-recorded and distributed “broadcasts” on Amateur Spectrum MUST be subject to the same controls that other broadcasting media are subject to.

Statements that are commentary or opinion in nature emanating of a person or organisation – directory or indirectly – must have clearly identifiable authorisation and accountability i.e. “Written and authorised by”. There must be accountability at both an individual and organisational level for the content of such “broadcasts”

I have raised these concerns as I under extensive consultation feel that such broadcasts are creating much of the disharmony in the Amateur Radio Community – hence the “administrative Burden” that the ACMA constantly reports.

Bringing AR Broadcasts under the same controls as other media will bring these broadcasts into line and may also provide better guidance for liability insurers - who themselves may “force” better standards.

Amateur Spectrum is NOT the proper place for pre-prepared and pre-recorded broadcasts – especially content that may have political overtones. Community and Commercial Media are the proper and intended medium.