

Response to the ACMA Consultation questions:

Submitted by Stephen Gregory, VK3OT

September 29th 2022

Advanced Amateur Licence since 1976.

BOCP Certificate since 1969

Broadcast Senior Technical Officer 2002-2022

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: The lower end of the 50MHz band is an International Allocation of International Significance and is primarily for contacts outside of Australia, which are by their very nature weak signals, often fleeting. If standards are granted access they need to be reminded and to observe operating protocol, not to cause interference and no local contacts within the DX window between 50.1 and 50.150. I am unsure if they should be granted FT8 data privileges.

2. What are your views on the proposed policy on call sign transfer?

Response: The current protocol seems to work well. The ACMA reminders and facilitation works well as does the admin done by the Marine College.

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: Silent Key are becoming prevalent in our aging population and often rely upon the administrator to cancel all licences, gun, driving, pilots, and amateur. We generally hear about deceased hams, I don't think it's all that important for a call sign to be released promptly.

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?

Response: I hold Three VK3O contest VK3OTR and VK3OTR my remote, I also took VK3ZAZ which I use for VHF like I did prior to advanced call. If we are prepared to pay, unless there is a real shortage, is it a problem? Most other countries seem to do OK. We are paying for what we use. Reissuing call signs held by people for decades produces an identity problem.

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

Response: Bit expensive that's all, VK3O \$70 for a renewal? Why?

6. In the absence of amateur and station information being contained in the Register of Radio communications Licences, are there any amateur-operated registers or other existing voluntary registers that you would use?

Response:

I use QRZ.COM to look up stations in my logging or WIA call book for locals.

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

Response: I hold Japan and USA, I have operated from Vanuatu, Solomon's, Korea, Japan and USA. All were seamless and some quite cheap and easy to obtain.

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 ionosphere and trans-equatorial propagation experiments?

Response: I have held the first 6M EME permit since 1993 and observed closely the emr restrictions. I am a Broadcast Engineer and I am responsible for power reductions on TV sites to protect climbers. My EME antenna complies at 25 M AGL. I have asked for permission to investigate further the trans polar summer paths via Spread F and the TEP paths in winter recently discovered. Most overseas operators are running high power and we cannot get back to them. The ACMA had no problems setting conditions for EME operators, the only difference here is we do not elevate out antenna but on some eme contacts we use moonrise anyway and it has never been an emr issue providing your antenna is the correct height for its gain and pattern. I would like a chance to further investigate paths which I have exploited with our legal power levels, and with which I have set many record distances.

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?

Response: Unsure here, the 2M and 432 band for eme are adequately covered in view of the high emf from high gain antenna not so sure its such a good idea, I would suggest each individual justify what they want to do and why.

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.

Response: What do you mean by medium term.

I think a statutory declaration at licence renewal time that I have operated within the terms and conditions of my high power permit and note if any changes have occurred or are requested.

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

Response.

1000 watts is easily obtainable, 1500 up bit harder. 110-1000 is 9db roughly 1000-1500 2 db. Any amp not within its limits will be a problem and likely to generate interference. My yaesu amp is happy at 800 AVG 1000-1200 pep a bit stretched. Data is the latest mode and to be clear cw is old hat and not many people use it any more. But data really pushes the envelope and I have found even on MSK144 meteor scatter that finals get stressed even at 110 watts.

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?

Response: If you note the individual eme records on 2M 70 cm and higher the individuals concerned seem to be very technically competent, I think again if ACAM have concerns then request individual responses from applicants on the band in question, wrt interference, safety etc.

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

Response: At certain times of the year but not all of the time long distance 6M propagation occurs over the south polar paths and via TEP paths. These events are well documented and do not occur all of the time. As such the ability to come online and respond to an overseas station with a power higher than 110 watts would be an advantage. The old 400 watts pep does not hold anymore as most contacts are on data modes where our power limits of 110 watts are out of date. The current 400 watts is not permitted for all the station transmitting data, if you listen on the bands there is not much chatting on ssb going on.

14. For each use-case mentioned in 13, please briefly answer:

a. Why is a higher power limit needed?

To even the odds of making a long distance contact under rapidly changing conditions.

b. What are the specific limitations of the current power limit?

110 watts of data, inadequate.

c. What power level is required?

10 db more so that when he receive a data signal at -10 we don't get a -20 response if at all.

d. What is the technical description of this power level requirements (for example, transmitter output power, emission mode)?

FT4,FT8, 800-1000 watts high duty cycle.

e. What amateur service frequency bands would be used?

In my case 50 MHz I have 350 watts on 144 and 250 on 432 which I find adequate for voice. And on data the amps handle 110 watts nicely.

A KW amp on 144/432 is special engineering requiring technical expertise to operate imo.

f. How often will a higher power level be required?

As required, on conditions, totally unpredictable, based on my 30 years and breaking long distance records on 6M since 1979. In some cases I have never repeated those contacts in some cases often repeated.

If pressed. October to February and June to August, times 2100-0100 UTC and 0500-0800 utc but cannot swear to it.

g. What is the location of the station?

Which station? Mine or the other? Europe, Asia, North America, South America.

15. Should potential higher power authorisations be limited by location, position, event or something else?

Response NO! Why? If concerned about interference or eme make each individual justify their request don't just rubber stamp it.

I was given EME permit in 1993 and made the still standing 2 way CW records with USA.

I cant speak for others but I have always been conscious of my responsibilities for emissions but I am a broadcast rf worker so I have to be. My wife has pacemaker so again highly alert to any issues and I use a personal radiation monitor for my job and at home.

My friend I Macdonald an ex RI and I often talk about eme and emf he is a 2M and 70cm eme addict and I follow his lead.

I hope the acma favours our responses and trust that many amateurs do have an operating code of conduct and ethic.

Steve Gregory

VK3OT et al.

achievements listed here to shows results achieved.

VK3 VK3OT LU7DZ 20/04/91 28319.8 km long path CW

VK8 VK8OT LU8MB 18/04/00 26768.0 km long path CW

CW VK3OT K6QXY 07/11/93 12889.6 km 6M eme record CW

VK9XI EH7KW 14/04/03 12625.0 km CW

VK9LE & K6QXY 30/03/90 11225.0 km SSB

VK3ZAZ ZL1AKW 30/01/18 3009.7 km 2m sp Es FYI far end ran 1000 watts me 350 his report of me was weak. MODE SSB

Digital Modes - 50 MHz

VK3OT VP8EME 16/12/17 9886.0 km south polar path Falkland Island.

ZP5SNA 21/12/17 12731.2 km extended south polar path Paraguay