

NE & LA Mattick

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1st of November 2022

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

Dear Manager,

Regarding Class-licensing regulations and other conditions in review – 2022.

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? (See section 3.)

No I do not foresee any constraints for Standard Amateurs to have access to spectrum in the 50-52MHz band.

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.)

Yes this should be more than adequate to determine call sign utilisation.

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.)

Given that the discussion papers required consideration of call sign availability (and or sequence / category exhaustion) I recommend that the number of allocations to one individual should not exceed four call signs.

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

None, insofar that due diligence applies to the entity managing a database of allocations and or vacant call signs.

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.)

At this stage I only recall one public listing of users' with a License whom have voluntarily provided a web site to host or list their details and call sign; even so it is very limited in participation by comparison to the total licensee's mentioned in the consultation paper.

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 intercontinental ionospheric and transequatorial propagation experiments? (See section 6.)

Yes, applicants should be able to do so, provided that emission standards are compliant and do not affect human health.

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.)

Yes, to limit access to Advanced Amateurs would / has always been an incentive to upgrade the licensee's abilities so this restriction would be appropriate to apply.

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

a. Why is a higher power limit needed?

I should say that localised noise present in and around modern technology would be a significant limiting factor to reception from experimental transmission; therefore it is reasonable to require increased transmission power to overcome industrial/ domestic spurious emissions present across the spectrum at a receiver.

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.

If the user of the approval for higher power permission is rural/ remote and does not exceed the personal radiation harm specification (as defined) then consideration should be permitted.

Thank you for the opportunity to participate in the consultation with regard to.

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Neville Mattick
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