

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

26 November 2022

Re: Consultation Paper Proposed amateur class licence and considerations for higher power operation. IFC 31/2022

Dear Sir/Madam,

Many thanks for the opportunity to comment on the proposed amateur class licence and considerations for higher power operation. I wish to address several points in the exposure draft of the Radiocommunications (Amateur Station) Class Licence 2022. Specifically:

1. In section 5 Interpretation, the definition of power *Py* is incorrect, it should be **mean power** not just 'power' to align with the provisions of the ITU Radio Regulations No. **1.156** and No. **1.158**. This error occurs in several places in the draft document and should be corrected.
2. The reference to **emission mode** should refer to WRC-19 instead of WRC-12.
3. In Section 17 the **quiet zone** should be **radio quiet zone** to be consistent with the rest of text.
4. In Schedule 1 – Conditions about electromagnetic energy; the definition of **far field** is different to that provided in Standard AS/NZS 2772.2.2016. The definitions need to be consistent between the class licence and the relevant standard.
5. In general, the text covering Conditions about electromagnetic energy is overly complicated and fails to consider the nature of the amateur and amateur-satellite services. There would be few, *if any*, amateur stations to which the older provisions apply so the 'grand fathering' text is irrelevant and unnecessary in my view. I suggest removal of all the text covering arrangements prior to the current date and specify that the new provisions apply from when the amateur class licence comes into force.
6. Furthermore, the proposed provisions fail to consider that a typical amateur station is dynamic in the sense that it is common for station operators to change antenna types, pointing direction, transmitter power levels, emission modes etc. so that they may improve and optimise their station. The rules, as written, do not allow for any changes and this is in direct opposition to the very definition of the amateur and amateur-satellite services.
7. Considering the above points, I suggest developing a 'compliance envelope' that an operator can use to ensure compliance with the exposure standard while allowing the operational flexibility that is characteristic of the amateur services.
8. The text covering call signs is overly long and complex, it seems that the previous technical and operational provisions have been replaced by a complicated set of administrative provisions; is that really the desired outcome if the intent of the class licence is to reduce regulatory burden?
9. Regarding the use of assigned scientific licence (Q 9) for higher operation, this *may* be applicable for *some* experiments that *do not* involve two-communications. However, if the experimental

purpose is to *develop or improve communications between amateur stations*, then it is not appropriate to operate under assigned scientific licence because the intercommunications must be *between stations of the same radiocommunications service*.

My views and comments on the rest of the questions that are asked in the consultation document are aligned with the response given by the Wireless Institute of Australia.

Yours Sincerely

Dale Hughes VK1DSH