

# ACMA consults on proposed changes to amateur access in the 50–52 MHz and 3.4–3.6 GHz frequency bands

Comments by

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Again, thank you for the opportunity to comment on the proposed changes to amateur access to 50-52 MHz band. I am completely ambivalent about the 3.4- 3.6 GHz band. In any circumstance I can not conceive of an idea of why I would ever require access to that band.

I of course welcome the proposed change such that, as a Standard Licence holder I will finally have access to the full 50-54 MHz band... Wonderful news – and I ask why we were ever restricted to the upper portion.

However – while welcoming this change, I am astounded at the inconsistency shown by the ACMA. It would seem a number of arbitrary rules are being retained for no reason OTHER than **“this is the way we have always done it”** ..... A tired old argument voiced by many aging amateur radio operators who argue that because they had to endure such regulations, then we all must... Those dinosaurs in the hobby are so resistant to change it beggars belief.

If a 13 year old youth with a Foundation Licence is now permitted to build test and operate their own amateur radio transceivers whilst having NO tested level of radio and electronic theory, then WHY oh WHY do we have the extant inexplicable restrictions on what HF band (for example) we Standard licence holders can use? WHY? I trained as a radio operator in the RAAF. Unfortunately my Air Force training is not recognised by either the ACMA or AMC...As an Air Electronics Officer I could operate on any of the radio bands available to the Defence Force, HF, VHF, UHF. I needed a lower level of technical theory than that now tested for the Advanced Amateur Radio licence. At least no more than an untrained or untested Foundation Licence holder..Yet, unless I study up on a whole raft of irrelevant theory, I cannot access two popular HF bands, but I can build test and operate the exact same equipment ANY other amateur radio operator in Australia can access – regardless of qualifications... It is a nonsense. A complete nonsense that licence levels are determined on technical knowledge, but regardless of licence, anyone from Foundation up can delve into full scope of build, test and operate.. Why do I need to sit for another demanding theory exam just to access the 30 and 17metre bands?– there is absolutely no additional technical knowledge required to operate these bands than that required to operate 80m and 40 m.... or even 50-54MHz for that matter. What is the point?

I have no issue with retaining your current restrictions to power levels. None what-so-ever. At 18 years of age, I was operating MILSPEC radio equipment at 400 watts across all HF bands, airborne radars at 143 Kilowatts, safely and of course legally. As a licenced amateur radio operator I am now required to operate at a maximum of 100 watts (and 30W (mean) for CW) and work all corners of the planet. We as AMATEURS do NOT need high power. If I held an Advanced licence, I would not waste my money buying equipment capable of 400 watts – it is not required.

The only reason I can see where different levels of technical/theory should “SHOULD” apply is to improve the safety involved with the construction/design and testing aspects of the hobby – the much vaunted “experimentation” aspects of the hobby (in which I have zero interest). For those of us wishing to simply operate and communicate in amateur radio, then why the inexplicable allocation of frequency bands based on whether Foundation, Standard or Advanced.... ? There is no LOGIC to the current and proposed structure and frequency band allocation to Foundation, Standard and Advanced. Talk about “Class” licence – that’s what we have – three classes of licence with no apparent reason other than to have some unwarranted pecking order within the AR community. WHY?

**Your proposed change enabling Standard licence holders to access the 50-52MHz band is welcome.** It makes complete sense. But you are not applying that same common sense to the whole Amateur Radio community. There are safety risks to amateurs being free to build test and operate their own radio equipment, but you do not require those newest to the hobby, and with no tested level of technical/theory knowledge ( Foundation Licence) to do just that. So why test it at all?

If my radio is faulty, I send it to professionally trained technicians to repair – not some amateur with questionable qualifications including inexperienced and untrained individuals who have not ever had any assessment of their technical and theory knowledge of radio and electronics. But that is what the ACMA has created since 2019. Let Amateur Radio Operators do just that..... **operate** and **communicate**. If you are going to insist on testing technical and theory aspects, then give it meaning – give it a reason. Right now, there is no reason, other than allocating wider access to RF bands.... Why do we need more theory and technical knowledge for that? As a professionally trained radio operator and experienced military communications instructor, I can assure you there is no reason for the level of radio theory currently expected of Standard and Advanced licence holders... ONLY if you restrict what amateur radio operators can build test and operated – and your proposed Class licence does not address that issue...

Sorry – but the LCD as released in 2019 – and that proposed (with a welcome change here and there) makes no logical sense. I just wish you could explain this lack of logic.

My bottom line – I welcome the change to access of 50Mhz to 52 Mhz – but you run the risk of missing a huge opportunity to open this wonderful hobby up to many more people, to make it more enjoyable – while keeping the rules and regulations focussed and relevant.

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