



The Radio Amateur Society of Australia inc.

BEING HEARD IS IMPORTANT

vkradioamateurs.org



The Manager

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

Via email: to SLPSConsultations@acma.gov.au.

Re: Review of Scientific Licensing Arrangements Consultation Paper

Dear Sir/Madam,

Please find enclosed RASA's response to the Review of Scientific Licensing Arrangements Consultation Paper, dated December 2022.

If further clarification is required, please contact us.

Yours Faithfully,



Paul Anslow VK2APA
President
On behalf of the Radio Amateur Society of Australia

3rd of March 2023



**The Radio Amateur Society
of Australia**
vkradioamateurs.org

The Amateur Radio Society of Australia Inc. (RASA)

Response to Consultation 39/2022

Review of Scientific Licensing Arrangements Consultation Paper

For Submission by Tuesday, 28 February 2023

Dated December 2022

Version 1.1

Foreword

The Radio Amateur Society of Australia (RASA) wishes to thank the ACMA for the opportunity to provide a response to the *Review of Scientific Licensing Arrangements Consultation Paper*, dated December 2022.

Consultation

Since the announcement of the ACMA's intention to bring in Class Licencing in January 2021, RASA has been in constant consultation with the Australian Amateur Radio community, via email, QTC magazine and club presentations. The responses to the consultation questions below are a result of those interactions and are from an Amateur Radio perspective only.

One point arising from our consultation process is the desire of the Australian Amateur Radio Community, that a united and consistent response from the sector is the best approach. This is in line with RASA's values, however past attempts to work collaboratively with the Wireless Institute of Australia have been unsuccessful.

The majority of the Australian Amateur Radio community is opposed to the ACMA's proposed arrangements to use Scientific Class Licensing as an approach to permit Advanced Amateur Licencees higher power, as put forward in the *Proposed amateur class licensing arrangements and higher power operation - consultation 31/2022*

Reasons have been given in the section titled "Summary" found further in this document.

Answers to Questions

Question 1

Are the existing conditions in the Scientific LCD for the operation of land stations and mobile stations appropriate? Are there any updates we should consider if we replicate these conditions in a class licence?

Response

RASA is under the opinion that this question is best answered by those actively using the existing Scientific Licences.

Question 2

Are the existing conditions in the Scientific LCD for UWB technology appropriate? Are there any updates we should consider if we replicate these conditions in a class licence?

Response

RASA is under the opinion that this question is best answered by those actively using the existing Scientific Licences. The Amateur Service has its own LCD covering permitted emission modes and assigned bands.

Question 3

The proposed class licence makes some minor changes to the provisions of the Scientific LCD, such as expressly providing for additional activities (repair and maintenance), and providing that people may operate devices in shielded enclosures as well as screened rooms. Are there any other updates we should consider?

Response

RASA is under the opinion that this question is best answered by those actively using the existing Scientific Licences. Amateur Radio licensed operators are able to perform design, build, test, repair and maintenance activities under their existing licence arrangement.

Question 4

Is the proposed class licence fit-for-purpose for the types of activities we are contemplating authorising? We welcome any comments on the form of the proposed class licence.

Response

RASA is opposed to the use of a Scientific Class Licence approach to allow Advanced Amateur Licencees access to Higher Power. The reasons are documented in point form in the summary section below.

Question 5

Should we amend relevant frequency band plans to allow for operation of stations authorised by the proposed class licence?

Response

RASA is under the opinion that this question is best answered to those actively using existing Scientific Licences. RASA is opposed to the use of Amateur Radio primary allocations by Scientific Class licencees. The reasons are documented in point form in the summary section below.

Summary

The use of assigned scientific licences to permit the use of higher power is inappropriate for use by the Amateur Radio Service and adds additional and unnecessary burden for all concerned.

1. The existing Amateur Radio legislation and licensing can provide an adequate framework base for the introduction of higher power as outlined in our submission RASA ACMA Consultation Response V1.6.
[Link [20221128 RASA ACMA Consultation Response V1.6 Final.pdf](#)]
2. The ACMA has aligned the Australian Advanced Amateur Radio Syllabus with the Harmonised Amateur Radio Examination Certificate (HAREC). A number of countries who have implemented T/R 61-02, allow higher power without any additional requirements. Therefore, the proposal is not in keeping with other countries' management of Amateur Radio with similar power levels proposed by RASA.

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3. The Scientific Licence and Amateur Licensing are for differing purposes. The Scientific Licence purpose is to give spectrum access to Commercial entities for research, development, servicing, etc and Academic entities such as, universities and schools for learning and research. The activity is carried out within an entity or institution, whereas Amateur Radio interacts between other amateurs locally and internationally, who are pursuing similar interests and goes beyond the activities of scientific experimentation and education.
 4. The Scientific non assigned frequencies include bands other than those specified for use of Amateur Radio by the ITU. By enforcing a requirement for Radio Amateurs to obtain a Scientific Class Licence may result in unintended unauthorised use of spectrum by either the Scientific or Amateur Services.
 5. By forcing Amateurs who wish to explore higher power to apply for an additional non Amateur licence blurs the intent and purpose of Amateur Radio and could lead to confusion and dilution of the Amateur Service.
 6. We also believe that complicating matters for amateurs may discourage some and encourage others to operate high power without applying for an additional licence. Anecdotally, there are amateurs who already operate their stations above 400W Px (PEP). By making increased power within the technical scope of the Advanced License, will result in an improved outcome for Australian Amateur Radio Service and the ACMA.
 7. It is noted that the comparison of Scientific Licence arrangements in other countries do not include the use of Amateur Radio under a Scientific Licence arrangement.

It is also noted that a comparison approach was not utilised by the ACMA with countries allowing higher power under an Amateur Licence in the *Proposed Amateur Class Licence Consultation and considerations for higher power operation consultation* paper.

This approach by the ACMA to Amateur Radio appears to be at odds with the management of other services, where RASA notes a more accommodating and flexible approach.

8. The questions asked in the ACMA's Review of Scientific Licensing Arrangements Consultation paper have very little in common with granting Advanced Amateurs higher power, raising serious concerns with the ACMA's knowledge and understanding of the purpose of and the activities undertaken by Amateur Radio Licensees.

RASA is willing to work with the ACMA to provide improved knowledge and understanding of the Amateur Radio Service purpose, activities and needs.