

Response to the Consultation paper: Proposed new amateur radio qualification arrangements and assessor accreditation scheme

Thank you for allowing the opportunity for amateur radio operators to provide feedback on the rules and regulations that will ultimately affect how we operate in the future. As an amateur radio operator, I see people in my life who also wish to join the amateur radio hobby, but are unable to for various reasons. I feel that some of the changes discussed in the consultation paper will give them, and I believe many others in Australia, opportunities to join this rewarding hobby that were not as present before. My responses to the questions outlined in the consultation paper are listed below.

Regards,

Josh Chadwick
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26th September 2023

Do you have any comments on the proposed qualification framework outlined in Attachment A?

In general, I agree with the proposed qualification framework. The changes I would make though would be to the remote examination requirements on page 8. These restrictions limit the ability for potential and existing amateur radio operators to sit examinations when testing in person is either not possible or undesirable. Further details of how I would like to see online examinations work are listed in the next question below.

Do you have comments about the development and implementation of a wholly online system for examinations and qualifications in the future?

Whilst I agree that providing the ability to complete examinations online is needed, it should not be the only option, as there are circumstances that would prevent some people from using this and a backup solution is required. As we saw with the COVID-19 pandemic, many people were able to continue work and education from home, and this has continued with some businesses continuing to provide the option of working from home for their employees. There were however some instances where this was not possible, either due to a lack of infrastructure or other circumstances. The ability for anybody, rather than those who fit a set of limiting criteria, to choose to complete an examination online if they wish would provide the opportunity for many new amateurs to enter the hobby when they previously would not have been able to. Examples of this would be due to availability during times when tests would normally occur or proximity to a testing location. The way that the FCC deals with similar issues in the US is to provide the Volunteer Examiners and Coordinators the flexibility to do the testing remotely at their discretion¹. These online examinations are held via video conferencing software and are proctored in the same way as professional qualification online assessments, with multiple observers and video of the surroundings to ensure that cheating is not possible. Having been part of online amateur radio communities that provide this facility to US amateur operators looking to upgrade their licence, or potential amateurs looking to sit their examination for the first time, I can say that this process has been heavily welcomed by the community with online testing sessions regularly filling up and would be a fantastic addition to the way that Australian amateurs are able to operate. There must, however, always be the option for an in-person examination if the examination taker or assessor prefers or requires it.

Do you have any comments on the draft accreditation rules at Attachment B, including the kinds of accreditation, qualifications and requirements of accredited assessors, process for applying and withdrawing accreditation, and conditions on accreditation?

I would like to amend the requirements for General Assessor Accreditation. In the US, the FCC has allowed amateurs accredited by a Volunteer Examiner Coordinator and who hold a General class licence (equivalent to our Standard licence) to administer examinations for Technician class licence (equivalent to our Foundation licence) candidates, and similarly accredited amateurs who hold an Extra class licence (equivalent to our Advanced licence) to administer examinations for Standard licences². Adopting a similar system in Australia, with Foundation examinations able to be

¹ <https://docs.fcc.gov/public/attachments/DA-20-467A1.pdf>

² "The examination for a Technician Class operator license grant is also prepared and administered by Advanced and General Class operators. Advanced Class licensees may also prepare and administer General

administered by Standard licence holders, would provide more opportunities for new Foundation level amateurs to enter the hobby whilst also spreading any potential workload for Advanced licence holders who would also be voluntarily giving up their time to administer examinations for new Foundation candidates. It would also be a way for Standard licence holders to give back to the amateur community in a fundamental and rewarding way.

Do you have any comments on the Accredited Assessor Guidelines at Attachment C?

In general, I agree with the proposed Accredited Assessor Guidelines. I would, however, like to propose changes to section 3 (pages 5-6) regarding the examination papers and question pools. Whilst I agree that candidates should not be able to see their assessment paper before the time of the examination, the question pools should be publicly available and viewable and not restricted to only those who are accredited assessors. The question pools for examinations in the US are publicly available³⁴ and allow potential candidates to study using tools such as HamStudy⁵ or through various other online and written study guides. I feel that amateur radio has a sense of openness and sharing with information, and restricting access to only certain people goes against this spirit.

Do you have any comments on the RPL process outlined in Attachment A, or any comments or suggestions about how the RPL assessment process could be improved? I agree with the proposed RPL processes.

Do you have any comments on the proposal to recognise Harmonised Amateur Radio Examination Certificate as a 'recognised qualification (Advanced type)'?

Allowing overseas amateurs to operate under their existing HAREC licence for more than 1 year as a recognised qualification feels like a good idea, but perhaps limiting this to say 3 – 5 years of continuous residency in Australia may be an improvement. This would allow a good balance for anybody moving to Australia sufficient time to settle into Australian life, but would limit any confusion when, for instance, someone from Canada with a HAREC licence has been living here for 20 years and continued to use a VE callsign instead of a VK one.

Are there any other matters we have not addressed in this consultation package that you believe should be addressed as part of the implementation of the new qualification framework?

I believe that there should a section of the ACMA recognition certificates that states that the holder is "qualified and licenced to operate an amateur radio station", or similar wording. This will be necessary when using these certificates to prove to other organisations (particularly ones who operate various gateway systems) that we are indeed covered by a licence and are authorised to

Class license examinations." – <https://www.fcc.gov/wireless/bureau-divisions/mobility-division/amateur-radio-service/examinations>

³ "Each question pool must be published and made available to the public prior to its use for making a question set" – <https://www.ecfr.gov/current/title-47/section-97.523>

⁴ <https://www.arrl.org/question-pools>

⁵ <https://hamstudy.org/>

operate. There are many of these, but examples would be obtaining a DMR RadioID⁶ or registering with the ARRL Logbook Of The World⁷. Another is registering with EchoLink⁸, which specifically states Australians need to upload both “Amateur Radio Apparatus Licence (NOT a Renewal Notice) AND Amateur Operators Certificate of Proficiency (AOCP)” to be verified. With the Apparatus Licence no longer applying, and the AOCP’s being replaced by the ACMA recognition certificates, we will need documentation that we are both proficient and licenced, which could all be contained in the single certificate.

Do you have any comments on the proposed fees for amateur qualification and call sign services outlined in the draft 2023–24 Fees Cost Recovery Implementation Statement?

I do like that the way the costs are calculated is explained as a calculation of time taken to complete the actions listed, as opposed to an arbitrary fee, but I would like to see a bit of transparency in how the times used in calculating the costs are determined. For example, just a little bit of an explanation as to why it would take 8 minutes to assign a random callsign (is this just clicking an “Assign random” button on a database form, or are there multiple steps to this). I would also like some information as to how the hourly rate of the ACMA is linked with the Consumer Price Index, and whether fees would remain the same despite inflation/recession, or whether they will raise and lower accordingly. Assuming we can see all this information, I feel the proposed fees are fairly reasonable and will be less than amateurs currently pay, which will be great for getting new amateurs into the hobby, as it will be less cost prohibitive to obtain the qualifications and callsign to be able to operate the radio. Especially wonderful is the free examinations, which means that if someone is unsuccessful on their first attempt, there is no penalty to try again.

Do you have any comments on the proposed consequential amendments to the draft amateur class licence to incorporate the new qualification and accredited assessor frameworks?

No, I believe these changes will be necessary.

Do you have any comments on the proposal to make a new legislative instrument, at the same time as the proposed amateur class licence is made, that would prevent any existing non-assigned amateur licences from being renewed further?

No, this appears to be necessary due to the non-assigned licences no longer being required due to being replaced by the class licence.

⁶ “The registration system requires mainly 3 types of data to process a request:

Type 1: Data which are required to verify and approve the request.

Example: The full name, callsign, location and License Document for verification.” – https://radioid.net/privacy_policy

⁷ “Email a copy of your Amateur Radio operating authorization and a copy of one other government-issued document that shows your name and address” – <https://lotw.arrl.org/lotw-help/getting-started/>

⁸ “New users wishing to have access to the EchoLink* system will be asked to provide proof of license during the validation process.” – https://www.echolink.org/validation_docs.htm

Do you have any comments on the proposed consequential amendments to the Radiocommunications Licence Conditions (Amateur Licence) Determination 2015, the Radiocommunications (Qualified Operators) Determination 2016, or Radiocommunications (Charges) Determination 2022 to support the transition to the amateur class licence and incorporate the new qualification framework?

No, these changes seem necessary for the reasons listed in the consultation paper.