

The Draft Amateur Radio Qualification Framework document, Recognised Domestic Qualifications section, Table 1, proposes holders of an Amateur Operator's Certificate of Proficiency will be granted a full exemption for the ACMA recognition certificate (Advanced). While the Amateur Operator's Limited Certificate of Proficiency will only be granted an exemption for Theory and Regulations for the ACMA recognition certificate (Advanced).

The only difference between the examinations for an AOCP and AOLCP was the Limited certificate was not required to pass a Morse Code examination. The examinations for AOCP and AOLCP was identical except for this Morse Code requirement.

As Morse Code is no longer a requirement the AOLCP should provide a full exemption for the ACMA recognition certificate (Advanced) plus all other levels.

The Recognition of Prior Learning Section includes Tables 3 and 4 for Overseas Qualifications but does not include any domestic qualifications for exemptions. A table should provide the qualifications that will meet the theory component such as Graduate and higher Engineering plus the Technical Officer qualifications which include a course of study with an appropriate level of radio communications theory. This table should also include the Commonwealth Eligibility examinations for transfer or promotion as a Radio Technical Officer as this included written theory and oral examinations plus a practical examination. Radio Technician qualifications should also be considered for Theory and Practical exemptions. Technical qualification that are required to be considered for a Radio Inspector position with the ACMA should also be listed. Any person qualified to inspect and evaluate Amateur Radio operators, equipment and installations must have sufficient prior learning to be automatically given the theory exemption.

Regarding the introduction, fees and costs for the proposed high power operation. The ACMA web site for applying for an amateur apparatus licence states:

To apply for an amateur assigned licence you should contact an accredited person

The ACMA provides a link to the accredited list. For Victoria there were only two entries. I approached one and was advised they would not handle any of my requested amateur radio work. This is 50% of the accredited persons listed in Victoria. I have deliberately chosen not to apply to both accredited persons in Victoria nor provided details as this is their business decision. I don't wish to name an individual.

The ACMA is required to provide estimates of the costs to users with the introduction of regulatory changes. The ACMA has not provided the time and costs associated with the additional regulatory burden by the ACMA that will be imposed by the introduction of the proposed high power operation. It may be possible to engage an interstate accredited person who is willing to perform this work. They may require interstate travel, accommodation, etc. A requirement for testing prototype equipment prior to operation will be an additional user cost. A Regulatory Impact Statement, consultations and CRIS should have included the increased user costs associated with this increased regulatory burden.

The ACMA requires best practice but has not provided a user cost or regulatory comparison to world's best practice in other jurisdictions.