

Australian Communications and Media Authority (ACMA)

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Ref: **Proposed new amateur radio assessor accreditation and qualification framework**

Dear ACMA,

Thank you for the opportunity to respond to the recent call for submissions for the proposed new amateur radio assessor accreditation and qualification framework. I appreciate the ACMA's efforts and excellent communication with the amateur radio community.

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

Feedback:

Remote examinations rules need to be reconsidered to better permit online exam testing going forward (further comments on this below). The 50km limit imposed is not practical in a multitude of cases.

Clarification is required for: **Table 4: Countries with which Australia has reciprocal licencing arrangements**. This is confusing when listing "ACMA recognition certificates you may be able to get" in relation to the United States of America. There is conflation in the table indicating that if you hold a technician (or General) class license you may be able to get Advanced, however there are multiple other options on this page whereas other countries have single options. See below example of conflicting information.

United States of America	Amateur Extra Class operator	Advanced
	Advanced Class operator	Advanced
	General Class operator	Advanced
	Technician Plus Class operator	Advanced
	Technician Class operator	Advanced
	Novice Class operator	Standard
	Amateur Extra Class operator	Advanced
	General Class operator	Advanced
	Technician Class operator	Advanced
	Amateur Extra Class operator	Advanced
	General Class operator	Advanced
	Technician Class operator	Foundation
	Amateur Extra Class operator	Advanced
	General Class operator	Standard
	Technician Class operator	Foundation

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

Feedback:

There was a comment made in the consultation paper - “We do not intend to use an online examination system for amateur radio examinations at this time. This is a topic on which we have received varying views from amateur radio stakeholders”

The ACMA needs to carefully reconsider its approach toward online examinations. It's been proven in other parts of the world (especially during COVID) that the ability to take online exams was highly beneficial to candidates and the amateur community. An example of this is the US “Exam Tools” platform. <https://examtools.org/>. I was able to sit my US amateur radio exam remotely from Australia, get instant results and a callsign issued within 2 business days, an easy automated process.

In comments I have heard from new amateurs who have recently gone through the current exam process, almost all of them have commented that they wish to receive instant grading, or feedback. This is especially true for youth who sit an amateur exam.

An appropriate evaluation of how online exam systems have been adopted and been beneficial in other countries may be of assistance to the ACMA in determining this decision going forward.

Feedback:

I am in full favour in the first instance of developing an online system that allows candidates to sit their amateur exam and get graded instantly, with results being sent to the ACMA, reducing both time, costs and increasing automation of processing applications and exams. The second instance, I'd like to see is this made available for remote exams via Zoom, Teams or other appropriate video conferencing tools, with rules in place for candidates. Sufficient rules already exist in other parts of the world, such as the United States.

I do not agree that a wholly online system should replace the conventional “pen and paper” exam as this would exclude some people who may not have the ability or skills to sit such an online only exam.

- What is the rough time frame the ACMA would look toward implementing an online exam system after the initial implementation in February 2024?

3. 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?

Feedback:

- Assessors cannot receive or obtain financial reward for examination services as proposed by the ACMA. Can assessors – or the clubs – propose a small fee to recover costs associated with the hiring of a suitable venue if one is not readily available?
- Records must be provided to the ACMA within 15 business days, and the ACMA has a turnaround time quoted as 10 business days after an examination has been complete. In the event of an online system, is it anticipated that this timeframe will be reduced and many systems automated in the process?

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

Feedback:

Please see above comment on Question 3 in relation to the use of cost recovery of suitable meeting rooms, halls or venues. Not all assessors will have access to these facilities or are associated with a radio club that has a suitable venue.

I note there is no rules in the guidelines pertaining to a candidate successfully passing an exam and immediately sitting a higher exam. For instance, if a candidate passes Foundation, will they be permitted to sit for Standard (if they believe they have prepared enough for this exam – and the assessor has the appropriate question papers available). Will it be at the discretion of the assessor to approve or deny such a request?

Many who sit an amateur radio exam would highly benefit from the ability to sit a higher level exam at the same time in the same session if appropriate to save time, costs and additional burdens on assessors.

Section 3.4: Will assessors be required to give all examination papers (regardless of result) in the event the candidate passes an exam (eg. Foundation) and then passes a Standard exam, but fails or does not sit Advanced?

Section 5.1: What is the timeframe available between resits after a failed exam?

Section 6: Is it possible for specialist assessors to be given the powers to conduct remote online examinations for all candidates if a switch to an online system is implemented?

Section 7: Remote assessments require evaluation regarding the 50km and other limits put in place. Lifting these limitations will allow considerable advantages to both the assessor and candidate including, but not limited to, flexible assessments, scheduling of multiple candidates, saved costs in relation to hiring of suitable venues etc.

The candidate should be the priority and many who have been through the process wished to have the convenience of remote assessments.

Feedback:

Section 8: In the event a candidate passes an exam and wishes to attempt the next highest exam (eg. Foundation passed, sit Standard in the same exam session) will assessors be allowed to prepare extra (spare) exam papers in the event that this should happen? Or should the assessor consult with candidates before the schedule exam day to ascertain their intentions on whether they feel like they should attempt two exams on the day.

Section 9: If online (remote) exams can be considered, guidelines around webcam placement, checking of the room and immediate surrounds should be included. The US exam system commonly requires a check of the room, floor, ceiling and surrounding area. Only one screen is permitted (the screen shared to the video conference call) and in some cases, a 2nd device such as a phone on the same video conference call providing the assessors an overall view of the candidate.

Section 9.3: Additional identification may be required here as not all candidates under 16 would have the relevant identification or parents/guardian available with access to the candidates Medicare card.

Section 11: There is no minimum time specified that the assessors need to wait before marking an exam and providing results to the candidate. Can there be clarification on whether an assessor can immediately mark all exams for a candidate in the session after the candidate has completed their examination?

The above is also in relation to the ability for a candidate to immediately know their exam result and choose whether to sit a higher exam in the same session.

Section 13: See pervious comment about online systems and system automation.

5. 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?

Feedback:

See previous comment on question regarding **Attachment A** and clarification around United States of America in Table 4: Countries with which Australia has reciprocal licensing arrangements.

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

Feedback:

No additional comments

7. 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?

Feedback:

Assessor lists – a recommendation would be to publish a map or list of nearby assessors according to postcode. This will assist in finding an appropriate assessor who hold either a General or Specialist Accreditation.

8. 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?

Feedback:

A main concern amongst the amateur radio community when these changes were released for consultation were the proposed charges for examinations. Unfortunately, these were released at the same time as the 2023-24 Fees Cost Recovery Implementation Statement, causing confusion amongst amateurs who wrongly pointed to the full costs should the ACMA be required to undertake examinations themselves.

I note the ACMA did indeed address these concerns and clearly indicated exam fees proposed in the amateur radio framework and qualifications consultation paper, however these perhaps should have been summarized on the landing page of the website here to avoid confusion:

<https://www.acma.gov.au/consultations/2023-08/proposed-new-amateur-radio-assessor-accreditation-and-qualification-framework>

Feedback:

Many amateurs saw the cost recovery fees more as an administration/processing fee.

The reduction in this cost has been well received in the amateur community in harmony with the removal of annual fees under the Amateur Class license proposed.

- What is the projected cost increase per annum in the ACMA's standard hourly rate charge of \$226 per hour? Will it be in line with CPI?
- Does the ACMA anticipate an increase in the estimated times stipulated in the draft 2023-24 Fees Cost Recovery consultation paper in regard to processing times when dealing with an amateur examination, therefore resulting in an increase in fees?
- Clarification is needed in the Draft 2023–24 fees for service Cost Recovery Implementation Statement Consultation paper on page 4: Type 4 – Application for a 'special event callsign' which states the total estimated time for ACMA staff to process is 50 minutes but the total charge (based on the hourly rate of \$226) quoted is \$52.75?
- In the event of an online portal/exam system, this will likely reduce the ACMA's burdens in processing an exam and/or would a fully automated process reduce or eliminate these ongoing costs – therefore should this be considered a priority for ACMA to implement?
- In the event candidate sits an exam, passes and then choses to sit a higher exam in the same session and passes that – will they only be required to pay the one fee for the issue of the highest ACMA recognition certificate obtained?

9. 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?

Feedback:

No additional comments

10. 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?

Feedback:

Many of the comments from amateurs in the community have been around renewal refunds, pro-rata etc.

- What would be the process to obtain such a refund?
- Will all existing amateur radio operators be issued a ACMA Recognition Certificate to replace the existing AOCF's. What method will this be delivered, digital or physical?

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?

Feedback:

- Many clubs have non-assigned apparatus licenses (club station callsigns). What will be the process for managing this and the transition to the class license?

General Comments:

In conclusion, I wish to express my gratitude to the (ACMA) for their exemplary commitment to fostering detailed discussions and robust consultations with the amateur radio community concerning these proposed modifications. The significance of affording the amateur radio community a platform for active participation in these critical deliberations cannot be overstated. It is noteworthy that the ACMA's email newsletter and communication channels have garnered widespread acclaim and commendation from numerous amateur radio enthusiasts.

I hosted an online YouTube livestream discussion focused on the proposal, during which we received an abundance of invaluable and constructive comments in the live chat section. These insights serve as a valuable resource for the ACMA in gauging the perspectives and opinions of fellow amateur radio enthusiasts. It is worth noting that this discussion has garnered substantial attention, amassing over 3,000 views as of September 25, 2023.

I highly encourage the ACMA to view this at the following link -
https://www.youtube.com/live/jK_tk5SmCb4?si=oeVqcMEUKhYVR5G4

We find ourselves in an exciting juncture for the future of Amateur Radio, one that promises considerable positivity and progress through the ACMA's proposed measures. As an advocate for enhancing the accessibility, visibility, and overall enjoyment of the Amateur Radio service in Australia, I hold a deep conviction that the proposed changes offer a unique opportunity to rectify past challenges such as prohibitive exam fees, prolonged waiting times, and assorted frustrations that have hindered the advancement of the hobby.

My overarching impression is that the ACMA is earnestly committed to addressing the needs and concerns of the amateur radio community. I eagerly anticipate the thorough consideration and eventual implementation of the feedback not only from my submission but also from other stakeholders.

Given the substantial presence of Amateur Radio operators in Australia among the audience of my YouTube channel, I extend an invitation to the ACMA for open dialogue and further consultations with our vibrant community. This collaborative approach will undoubtedly contribute to the continued growth and enrichment of the Amateur Radio service in Australia going forward.

Kindest regards

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<https://www.youtube.com/@HamRadioDX>