

Christopher Andrews VK4GDL

Having recently gone through the licencing process – first getting standard a year ago, and advanced a few months ago, there is a few things that could be improved about the current situation, some of which are fixed by this proposal.

There is two major sources of friction to getting the licence. The first is figuring out exactly the steps you have to take if you do not have a mentor to guide you through the process.

The second is the relatively high costs involved – it's currently cheaper to go through all the drivers licence tests until you have your open licence, then it is to get a standard/advanced radio licence.

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

I mostly approve of this framework – it's very similar to the AMC's process. There are some easy improvements though.

Currently finding an assessor on the AMC's website is a bit difficult, there is no sorting, distance from a location or a simple map to see where assessors are, you just have to keep scrolling through the list of assessors until you find one that might be close enough, and if not – ask if they are available for a remote exam.

With the AMC only specialised assessors are authorized to give remote exams. I asked the closest specialised assessor and he told me he only does in-person exams. Under ACMA's proposals general assessors can do remote exams which is a welcome change, but it's worth adding a tagging or sorting system to see which assessors do remote exams to save everyones time.

The first clause I would like to see go:

“It is important to note that in-person examinations cannot be conducted in a private residence.”

What is the reason for this? Having a desk or table is all you need for someone to do an examination, are assessors going to pay for a venue to hold an exam for (max) 5 people?

I'd suggest a complete removal of this restriction and leave that decision to the individual assessors. I understand meeting someone at their place can feel a little odd at first,

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but under the current process you need to be in contact with an assessor for a while before an exam takes place.

“Remote examinations will also be permitted when:

- > the nearest accredited assessor is more than 50 km away from the candidate
- > the candidate has an illness, injury, vulnerability or impairment that would not allow them to attend the examination in person
- > the candidate’s day-to-day movements are restricted due to government public health directions.”

I went through the remote exam process as my closest assessor was a 2 hour drive (200km each way) and did not respond to my emails. I’m thankful for the option of remote exams, but in my view they are either ok for everyone, or for no one.

Ideally, this clause should be changed to “Remote examinations are also permitted”, with no distance, disability, or illness restriction. This is one case where ACMA is going backwards from the AMC, which allows remote exams without this condition.

My remote assessor had a side view of my desk and screen via zoom, which is a good way to verify a fair test.

“Applications can be completed on our website”

I’m happy to hear this is moving off a paper process. The AMC delay was the bulk of waiting in my experience, and anything to reduce processing (wasted) time is a good thing.

I don’t have many comments on the RPL as it does not apply to me, but there is missing information in the proposal. In the “United States of America” section, there is different licence classes for different certificates which appear to be a copy of the AMC data, but the dates are missing.

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

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Giving people the option of doing an online exam would reduce friction to getting a licence and its development needs to be made a priority, *so long as it operates side-by-side with the existing exam system*. An assessor should still be required to verify a fair test.

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?

I'd like to see a removal of section 5, "An accredited person must not conduct an in person amateur radio examination in a private residence" and leave that choice up to the individual assessor.

While I am not currently planning on becoming an assessor, I would be comfortable conducting an exam at either my or an applicants place. The closest radio club is probably the Mackay Amateur Radio Club, which is 150km away.

If I did become an assessor, how would I conduct face-to-face exams if not in a private residence?

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

As with the previous question, removal of 1. General Guideline 1.2.

Section 3.2 is a massive improvement, being able to know the results straight away rather than the current process of waiting 3 weeks for the AOCP to arrive in the mail.

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Section 3.5 is an issue I have personally encountered on the advanced exam. There was an obvious issue with a transistor gain question, I brought that up to my assessor after the exam – he had already sent emails about it. Hopefully a question correction is given in a timely manner.

Section 7.1 should be reworked to allow remote assessments for all applicants by deleting “in particular circumstances”, “remote assessments are considered appropriate, when:”, and 7.1.1 to 7.1.3. Remote assessments can save everyone time, and the 50km exclusion seems arbitrary, especially in a case where you are unable to get in contact with a nearby assessor.

Section 8.1 is a nice improvement – assessors can instantly mark an exam and let the candidate know.

The rest of the guidelines are quite good.

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?

As this does not apply to me I am not concerned with the RPL, and will leave this to others who have gone through the process.

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

Acknowledgement of HAREC is a good thing, given the existing AOCP(A) is compatible with HAREC.

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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?

I would like to see the development of online systems to reduce the costs and processing time of getting licenced.

I would also like to see a simple "Steps to obtaining your amateur radio licence" document that can be followed exactly. I am lucky to have found <https://www.amateurradio.com.au/licence/standard> as I was unable to get in contact with the closest radio club / assessors.

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?

While the fees most of 3.3.1 Table 3 are relatively high compared to other countries, the applicable fees (Ref 2 and Ref 5) are ok given that examinations are free if provided by volunteers. Under no circumstance are the fees given under Ref 1 acceptable, the current situation of \$300 is steep and I know a few people are already avoiding ham radio for this reason, a proposal of \$600 will at best bar people from entry, or promote piracy. One only needs to listen slightly below 40m to figure that out what happens when you have an overly restrictive system.

The current costs are:

2 x \$94.50 examination fees

1 x \$37 level 2 callsign recommendation

1 x \$80 ACMA fee

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Under the new proposal, so long as the only two costs are the \$45.70 certificate + \$41.45 callsign, this is much more reasonable.

I do question why callsign allocation costs a different amount depending on the type, I would assume the system is unified – I would also make the assumption typing 2 letters does not take an extra 2 minutes compared to typing 3 letters. This is a holdover from the AMC that could possibly be dropped.

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?

I'm mostly happy with the changes, it is largely business as usual for the amateur radio community – but with a better licence process (minus a few things outlined in the earlier questions).

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?

As an apparatus licence would not be required given the draft class licence is almost a direct word-for-word copy, this is the correct action.

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11. 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?

These changes seem to be simple amendments to support the transition to the class licence. This is fine.