



(ABN 56 004 920 745)

**Wireless Institute of Australia
response to the
Australian Communications & Media Authority
ACMA Consultation 08/2023:
“Proposed amateur radio qualifications and assessor
accreditation arrangements”**

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Executive Summary

The Wireless Institute of Australia (WIA) thanks the Australian Communications and Media Authority (ACMA) for the opportunity to provide feedback on public consultation on the proposed amateur radio qualifications and assessor accreditation arrangements. The WIA looks forward to continuing to work with the ACMA to support and facilitate the amateur radio service in Australia.

The WIA Board has received responses from both the WIA Education and Spectrum Strategy Committees and we are pleased to present these responses to the ACMA. The WIA has received significant positive feedback about the proposed changes to the Accredited Assessor framework and we look forward to working with the ACMA on their implementation.

1.0 Introduction

The WIA through its Education and Spectrum Strategy Committees has undertaken a detailed review of the proposals by the ACMA for the amateur radio qualifications, assessor and assessor accreditation arrangements.

It has considered carefully the opportunities and risks presented by the proposed changes, while noting the strong motivation within the ACMA to reduce the administrative costs of facilitating the amateur radio service in Australia.

This submission explores the unique characteristics and requirements of the amateur service (see appendix A), and how those characteristics and requirements may be accommodated and supported within a revised assessment framework.

This response follows the structure of the ACMA consultation paper and provides feedback where appropriate.

2.0 Proposed amateur radio qualifications framework

Draft response to the ACMA Consultation on Proposed amateur radio qualification and assessor accreditation arrangements

2.1 Framework

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

Request for Feedback:

Examinations:

Clarification is needed as to why a 50 km limit has been recommended for remote assessments.

In practice, many candidates and volunteer assessors find it more convenient to use the remote system for **individual** candidates, to avoid wasted travel time, venue hire costs and gain the advantage of more flexible assessment times.

Other advantages to using the remote assessment system include:

- an assessor local to the candidate may not be available due to work, holiday, or illness.
- there may be no suitable venue, or the usual venue is unavailable.
- depending on how the process is structured, reduce the impost on the volunteer assessor for printing costs.

With the potential restriction on using a private residence for assessments, using remote assessments may be the only option (see response to section 2.5 - question 4).

The remote assessment is a valuable tool to provide an efficient delivery of an assessment service on behalf of ACMA.

2.2 Online Assessment Systems

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

Request for Feedback:

The move to an online system is welcome however it should not be the only method.

We have a concern and are interested in the ACMA's thoughts on how such a service would be provided for those that may not have computer access, have visual or other limiting disabilities, poor or no connectivity, or low levels of digital literacy?

2.3 Accreditation Rules

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?

Request for Feedback:

No further comment.

2.5 Accredited Assessor Guidelines

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

Request for Feedback:

The WIA is seeking clarification on **Section 1.2** of the Guidelines about why the use of private residences for assessments has been removed? Could there be a definition of private residence included in the Guidelines?

The WIA supports the continuation of the current one assessor to five candidate arrangements.

Not all assessors are associated with a radio club that have access to a suitable venue. The suggested use of community halls or other venues usually attracts a hiring fee that Assessors may, or may not be able to recover. Many halls and venue require the assessor or organisation to have their own public liability insurance. Is the assessor expected to carry this fee to provide the service, particularly for a single candidate? In **Section 1.5** the ACMA states that Assessors must not charge for their services (see section 3.1 - question 8).

Section 3.1 Will ACMA provide photo sheets and other aids for the practical assessment for each application or will they be issued to registered assessors for future continued use?

Section 5 We note that there is no minimum time specified between a failure and a candidate resitting a subject. Will this be left to the discretion of the assessor?

Section 7.1 Why? See previous comments on Attachment A examinations and the 50km limit.

Section 9.3 We believe the following should be added - "identification by a parent or guardian with suitable identification for minors without photo identification". Many assessors undertake assessments involving minors for example - Scout and Guide groups.

Section 13.2 We are interested in further details on how the ACMA Assist Portal process will work for downloading and uploading information and will there be provision for the assessor to sign off a candidate's result? Is this information to be returned electronically via the ACMA Assist Portal or post? We understand the fall-back position is email exchange whilst the Portal is being created and therefore can you confirm that the postal service is not being considered?

2.6 Recognition of Prior Learning (RPL)

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?

Request for Feedback:

Possibly the introduction of an open, transparent and documented process of RPL, available on the ACMA website that could be streamlined through online submission via the ACMA Assist Portal of key evidential documents. Similar validated processes are used in the VET sector and could be helpful to this context. The WIA Education Committee members have significant experience and expertise in this area and are keen to assist.

2.7 Internationally recognised AR Examinations

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

Request for Feedback:

The WIA supports the policy of overseas amateurs (HAREC, non-HAREC or RPL'ed) undertaking a regulations assessment to ensure understanding of the Australian regulatory context.

2.8 Other matters

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?

Request for Feedback:

The WIA is aware that there were nearly 300 assessors when the WIA ran the assessment service for the ACMA. The WIA is actively encouraging assessors to re-accredit and we would like to work with the ACMA to try and bring these

assessors back into the assessment system and help and support the ACMA in delivering the assessment service throughout Australia. We look forward to discussing this with the ACMA about how best this can be achieved.

3.0 Fees and Costs

3.1 Fees and Charges

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?

Request for Feedback:

We agree with the intent of this document, however comments received from the amateur community link the published fees to an assessment cost rather than the fee being for ACMA Cost Recovery purposes. Further clarification may be helpful.

There is still some concern from assessors who are not supported by clubs as to their Public Liability Insurance coverage. Does the ACMA have any further comment on this matter?

Although not strictly relating to fee structure there is a significant degree of concern that has been expressed to the WIA from assessors about the ability for the assessor or supporting Club to recover costs in some way. The WIA appreciates and applauds the significant drop in assessment fees due to this service being provided by volunteers. However, assessors especially in remote and rural locations are concerned they will end up covering costs. The WIA is proposing that assessors (not associated with clubs) and Club supported assessors be able to charge a modest facilitation fee to cover costs. There needs to be a standard applied to this fee to ensure uniform application across Australia.

4.0 Consequential Amendments

4.1 Consequential amendments to incorporate qualifications and frameworks

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?

Request for Feedback:

No further comment.

4.2 New Legislative Instrument

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?

Request for Feedback:

Further clarification on the licence transition process from non-assigned amateur apparatus to class licence would be helpful to inform the amateur community. Possibly including some common scenarios like:

- Amateur pays licence fee in:
 - January 2024
 - August 2023
 - January 2023

Some further information about the shift from an Amateur Operators Certificate of Proficiency (AOCP) to a Recognition Certificate and the legal and cultural shift to a framework of “recognising” an amateur can operate as they meet certain conditions prescribed by the Amateur Class Licence. This material can be included in regular and clear market communication to the amateur community from the ACMA. The feedback the WIA has had from the amateur community about the ACMA amateur email newsletters and information on the website has been positive, please continue this type of focused communication.

5.0 Other Comments

5.1 Consequential Amendments to existing documents

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?

Request for Feedback:

It has come to our attention that there are a number of third party authorisations for club remote stations that will cease with the introduction of the class licence - some thought will need to be given to transitioning these arrangements under the new framework.

ACMA indicated that callsigns/licences will no longer be issued to Clubs or organisations because, under class licencing system as it has to be a natural person. This raises the following questions:

- How will existing club licences be handled / transitioned?
- Could the licence be reissued to a nominated natural person (officer of the club) with an Advanced Recognition Certificate for continued use.
- When that nominated person moves on would there be a process to transfer the licence to another nominated person if indeed the original nominated person will relinquish the callsign/licence.

The WIA is concerned about ensuring and maintaining the integrity of the assessor system and the feedback we have received from assessors is they are also concerned about the transition of the assessor system to the ACMA. The WIA Education Committee is a group of professional educators (and assessors) who are keen to work with the ACMA on these aspects (and more) to maintain and build on the integrity of the system whilst it is being transferred and maintained.

6.0 Conclusion

In conclusion the WIA values an ongoing and productive relationship with the ACMA. The WIA is appreciative of the amount of work that has gone into the transition to a class licence and the transfer of the accredited assessor framework to the ACMA.

The amount of communications, newsletters and supporting documentation is also very much appreciated to keep the amateur community ahead of these changes.

The WIA looks forward to working with the ACMA as they transition to the Class Licence and new Assessor, Assessment and Callsign management arrangements.

Appendix I - Value Of The Amateur Service

One of the goals of a simplification agenda should be to enhance the value of the amateur service to Australia; understanding and recognising that potential is key. Approaching the reform with a view to delivering increased value to the Australian people, through value creation as well as cost reduction, is fundamental to meeting the expectations of the amateur service.

Amateur Radio is a vehicle for technological literacy. Areas where the amateur services brings value to the community with no cost to the Government and community include:

A.1.1 Inter-communication

- **Inter-communication** - facilitating the exchange of ideas, wellbeing, connectedness and understanding across Australia's multicultural community.

In particular, using the idea of self reliant communication, the amateur service supports the health and wellbeing of the Australian community through events such as:

- [Scout & Guide Radio Jamboree](#)¹ held globally each year.
- [Community sporting events](#)² such as canoe marathons, equine endurance events, car rallies, cross country cycling events and more.
- [Radio Sport](#) activities enable physical fitness and activity through (for example) the ARDF international competitions which combine orienteering with radio direction finding, as well as the Summits on the Air program (mixing mountaineering with amateur radio).

The value of these community based, community delivered communications capabilities via radio are hard to calculate in dollar terms, but are nonetheless invaluable to the function of such events. Indeed, during this COVID19 pandemic, more and more people have turned to, or returned to, amateur radio as a way of keeping in touch with community, friends and family across town or across the world.

A.1.2 Self Training

- **Self training** - promotion of Scientific, Technology, Engineering, Arts and Mathematics (STEAM) accessibility throughout Australian society, not just through formal education channels. This delivers value through:
 - [School science programs](#)³ through, for example, communicating with the International Space Station ([ARISS](#))⁴ or flying and tracking high altitude balloons (e.g. [Project Horus](#))⁵.
 - [Engineering professional development](#) through self training on advanced communications techniques particularly on the VHF/UHF/Microwave bands.
 - [Citizen science programs](#) such as wildlife tracking, [space weather monitoring](#)⁶, [radio propagation studies](#)⁷ and many more
 - [Advanced Communications Techniques Developments](#) are being undertaken by individuals and groups across the country are facilitating new advanced communications techniques including developing new modes and methods of communication via radio (for example the development of HF

¹ <https://www.jotajoti.info/>

² <https://www.areg.org.au/archives/category/activities/rpm200>

³ <https://www.sarcnet.org/>

⁴ <https://www.ariss.org/>

⁵ <https://www.areg.org.au/archives/category/activities/project-horus>

⁶ <https://www.solarham.net/>

⁷ <http://wspnnet.org/drupal/wspnnet/map>

digital voice communications using the Codec2 based [FreeDV](https://freedv.org/)⁸ modulation or advanced weak signal communications ([using the WSJT-X software suite](https://physics.princeton.edu/pulsar/k1jt/wsjsx.html))⁹ such as FT8, JT65, WSPR, MSK144 and many more.

- Building Practical skills within graduate professionals and helping bridge the gaps that have appeared in formal radiocommunications educational pathways (eg the loss of the BOCP and TVOCP certifications) through self training able to be undertaken within the amateur service.
- Recommendation ITU-R M.1043-2¹⁰ addresses the use of the amateur and amateur-satellite services in developing countries. It recommends that administrations encourage and facilitate the amateur and amateur-satellite services in order to develop radio operator skills, train engineers and technicians to design, construct and maintain radio equipment and systems, assist in forming groups capable of providing local support, exchange technical and operational information, experiment with new technology, and establish stations in rural and remote areas, among several other objectives.
- “When all else fails” - amateur radio facilities are being deliberately planned and included in professional emergency management centres as emergency management professionals are realising that the comparatively low cost of having amateur radio equipment available “. . . provides ultimate redundancy if all else fails.” [(a) David Youssef, Coordinator, Disaster Management, Disaster Emergency Management Centre, City of Gold Coast, Qld; interviewed in *Amateur Radio*, Issue 5 - 2023, page 24. (b) Tablelands Regional Council, Qld; “A far north initiative” in *Amateur Radio*, Issue 5 - 2023, page 22.]

A.1.3 Disaster Relief Communications

- **Disaster Relief Communications** - where in Australia organised self-training obtained within the amateur service facilitated by groups such as the [Wireless Civil Emergency Network \(WICEN\)](https://wicen.org.au/)¹¹ has enabled operators from the amateur service to act for the direct benefit of the community. For example:
 - Relief Operators in disasters - WICEN operators played roles as relief operators in disaster communications centres during the Summer 2019/20 bushfires.
 - Secondary backup communications - WICEN trained amateur radio operators also provided communications networks to the community on the NSW south coast last year when the public and government communications networks failed.
 - Primary disaster communications channels - amateur radio was one of the first means of communications re-established in Darwin in 1975 after Cyclone Tracey - being used to carry news and information for the ABC and 2GB out of Darwin.
 - International Disaster communications¹² - the amateur service is recognised as a vital source of skilled operators able to enter disaster areas and set up communications networks with limited support. It was the amateur service that stepped in during several of the Caribbean hurricanes in the last couple of years. This capability of the amateur service is in fact recognised and encouraged in the ITU Radio Regulations through ITU-RR 25.9A.
 - Recommendation ITU-R M.1042-3¹³ addresses disaster communications in the amateur and amateur-satellite services. It is recommended that administrations encourage the development of amateur service and amateur-satellite service networks capable of providing radiocommunications in the event of natural disasters, that such networks be robust, flexible and independent of other telecommunications services and capable of operating from emergency power, and that amateur organizations be encouraged to promote the design of robust systems capable of providing radiocommunications during disasters and relief operations.

⁸ <https://freedv.org/>

⁹ <https://physics.princeton.edu/pulsar/k1jt/wsjsx.html>

¹⁰ <http://www.itu.int/rec/R-REC-M.1043/en>

¹¹ <https://wicen.org.au/>

¹² <https://www.iaru.org/on-the-air/emergency-communications/>

¹³ <http://www.itu.int/rec/R-REC-M.1042/en>