

UNCLASS

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The Manager
Spectrum Licensing Policy Section
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In response to ACMA request for comment regarding, "Proposed changes to class licences - consultation 06/2021"

Firstly I object to any reference to the Amateur Radio service as if the consultation process on the proposed changes to Amateur licensing arrangements with the end date of the 2nd of April 2021 is concluded to the preferred outcome of a policy change by ACMA of the unassigned apparatus licence to a class licence.

It is unconscionable by ACMA in not having advised in the intended class licence conditions as stated in the current legislation, to then request comments with in a very short time frame, is just manipulation with intent to overload those concerned and affected by the changes.

Then ACMA continues to assert that it's not legal to possess equipment unless some licencing instrument quoting section 3.1 46 & 47 is in place.

Again I state the legal point that ACMA will be hard pressed to present a case in a court of law that possession defines intent or operation. The interpretation by ACMA is WRONG, if the spirit of the section is to prohibit possession it should do so and suffer any consequences under human rights interpretations.

In the consultation and the proposed amendments ACMA places responsibility upon the amateur radio service operator to comply with standards as set out in the ARPANSA EME standard whatever that is. ACMA makes lots of statements that its simplifying the regulatory requirements of licence holders by streamlining all sorts of processes, providing mountains of material to read and absorb, ACMA has in my view convoluted and purposely set a limited time table presented to stake holders in a confusing manner making many walk away from the process, this clearing the way for the proposed ACMA changes reducing objections to the changes.

The manner that ACMA proposes to allow overseas visiting radio amateur operators to be assigned a class licence is very clever on the part of ACMA, this a first step to push ACMA

policy in the face of opposition, I wonder how this will conform with the ITU treaty.

ACMA spectrum policy review is incomprehensible to me and many others, why you would as a government department, there to serve, frustrate something that has provide community benefits at no cost to government for almost 100 years.

I do not support any inclusion of the amateur radio service into the proposed class licence. I also state that the manner ACMA has proceeded in these reviews is unconscionable operating with hidden agendas that border to dishonesty.

Robert Campiciano