RASA Submission:

New approaches to amateur radio qualification arrangements
Consultation paper

Submission date: 29 June 2018

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Background

The Australian Communications and Media Authority (the ACMA) is reviewing the way in which amateur radio operator qualifications are conferred. The current arrangements have been in place since 2009. The ACMA is contemplating three approaches to how amateur radio qualifications might be conferred in future, which are set out in the Consultation Paper. The ACMA also declares that other methodologies for assessment may be considered. The ACMA is also considering the establishment of a Syllabus Review Panel, which could ensure that amateur syllabuses remain fit-for-purpose.

The ACMA reference for this response may be found at:
https://www.acma.gov.au/theACMA/new-approaches-to-amateur-radio-qualification-arrangements

The Radio Amateur Radio Society of Australia is pleased to respond to the ACMA and welcomes questions or further discussion.

The Radio Amateur Society of Australia

The Radio Amateur Society of Australia Inc. (RASA) was formed in 2017 with the aim of increasing representation and improving services to Amateur Radio Operators and Australian Radio Clubs. It is registered as a National Body with ASIC. RASA's primary efforts are focused on improved education and awareness in the areas of regulation and administration, as well as strong evidence-based representation with the regulator.

As of June 2018 RASA had over 500 members and is steadily growing.

RASA regularly sends information bulletins to more than 100 Australian Clubs and frequently seeks feedback from the Sector.

RASA's objectives are to:
- provide evidence-based research and strategic direction for issues related to the Amateur Radio Sector;
- promote Amateur Radio and its role in facilitating emerging communication technologies;
- educate and encourage the next generation of Radio Amateurs; and
- lobby the regulator to protect and enhance the Sector and privileges of Australian Radio Amateurs.

For more information about RASA please visit http://www.vkradioamateurs.org
Any questions about this document may be directed to: info@vkradioamateurs.org

Executive Summary

RASA recognises that the current arrangements for amateur examinations, put in place in 2009, have become out-dated, inefficient, expensive and have created significant discourse and inconsistent performance outcomes for the Sector and the Regulator.

RASA sought the view of the Sector via email, our bulletins and website.

It is noted that the ACMA indicates a strong preference for a Registered Training Organisation (RTO) in all three Approaches proposed in the Consultation Paper.

It is our view that Amateur Radio is neither a vocation nor a trade. Amateur Radio qualifications are not formally recognised for paths to further education or employment. Amateur radio is a hobby and community service activity and, as such, the rigour, cost and impost that are inherently a part of the RTO model are not necessary to meet operational and technical qualification obligations.

However, ACMA's regulatory obligations require a level of rigour and inspection to ensure integrity and auditability. It is noted that the existing system has suffered significant operational shortcomings and compliance issues.

The Sector seeks a model that:
- is financially viable for candidates and places no additional cost on the regulator;
- is responsive, efficient, accessible and uses 21st century service delivery platforms; and
- provides ACMA with an adequate level of oversight and regulatory compliance.

The RTO model, whilst robust, only adds cost and overhead to what is a not-for-profit Sector.

The United Kingdom (UK) model has provided good boilerplate development for the hobby of Amateur Radio in Australia for many years. Indeed, the design of the Foundation Licence and the Vocational model for assessment was derived from the UK. It is to be noted that Ofcom has successfully moved away from the UK VET/TAFE involvement in assessment to a model based within Amateur radio.

RASA suggests the ACMA consider a model similar to that practiced in the UK. Such a model avoids the impost of an RTO, but still provides regulatory oversight for a government regulator with similar obligations to that of the ACMA.

This suggested model satisfies the needs and aspirations of the Sector, those being value for money, responsiveness, accessibility and compliance. The delivery and regulatory platform has been tested and proven in the UK.

RASA believes a model based on the UK experience would satisfy the regulatory requirements placed on the ACMA by the ITU, as well as meeting the expectations of the Sector and its stakeholders.

Context & approach

Existing contractual arrangements for Amateur Radio licensing are due to expire early in 2019 and the ACMA have called for a review.

The ACMA has suggested three different models and has invited input from Australian Amateurs and organisations.

RASA undertook a consultation process, seeking input from Sector participants and has consolidated all feedback into this response.

By its charter, RASA is a consultative organisation and sought feedback without pressing a specific agenda. This was done by requesting information from Australian Amateur Radio Clubs and Amateur Radio Operators, both by email and through our website:
http://vkradioamateurs.org/rasa-calls-for-comment-on-acma-paper/

The responses received have been divided into broad two categories and are provided in the Appendices.

Appendix 1 contains broad views, which explore framework modelling and overall feedback on the existing system.

Appendix 2 contains specific views on the details of how the actual work should be carried out and new efficiencies for consideration.

Feedback & assessment of the existing system

To provide holistic and practical input to a successful system for the future, it is important to note where the existing model has failed to meet Sector and Regulator expectations.

RASA sought feedback from Sector representatives; especially assessors and candidates. There were a significant number of responses critical of the examination services presently being conducted.

1. **High Cost**
   Presently, if a candidate is to work their way through the three different classes of license: Foundation, Standard and Advanced, and are fortunate enough to pass all exams first time, they will pay a minimum of $375, plus license fees. This is despite all assessors being unpaid volunteers and a statement from the incumbent service provider that they making significant losses delivering existing services. This cost is seen as a significant barrier for new entrants to the hobby. The incumbent service provider has flagged that a cost increase will be required to maintain the service and that this will be borne by candidates. The view held by many assessors indicates that the high cost of exams is already cutting into the number of persons entering the hobby. Any additional increase to these fees is unwarranted and is a direct result of inefficient work practices.

2. **Responsiveness of the service**
   In state capitals there are a limited number of clubs in a position to conduct exams regularly. Typically, these events are conducted a few months apart. Candidates living in rural areas have even greater difficulty and must be prepared to travel long distances to undertake an exam. Although remote assessments are possible they are often difficult to achieve. Once an exam has been conducted, the candidates are informed of the outcome, but the incumbent provider's Exam Service and ACMA procedures take up to six weeks to process and allocate a valid licence. Such delays act as a barrier and disincentive for prospective entrants to the hobby.

3. **Inefficiency & High level of Administration**
   Several assessors provided feedback and cited the difficulties they face in their work. A common complaint was the extraordinary amount of administrative work for each exam, with the candidate processing typically requiring as much time as the exam itself. Assessors perform little actual assessment work as their job is essentially invigilation.

4. **Difficulty & Restrictions to becoming an Assessor**
   Some complaints have been made about delays and difficulties associated with applying to become an assessor, including irrelevance of the training material. In its present form, a large amount of travel time is required to link up with a second assessor to stage an exam. For example, the whole of Western Australia only has nine listed assessors, of whom only five are active. These issues have had a serious effect on the number of volunteer Assessors willing to take on this work. Mandatory membership of the incumbent service provider also seriously limits Sector participation, as only 30% of Amateur Radio operators are members.

5. **Failure to use modern technology**
   Despite some limited attempts to trial on line delivery, the current system is paper-based. Exam papers must be ordered well in advance (fourteen working days in some States and Territories) due to unpredictable postal services. Back-office procedures are all paper-based and thus also rely on postal services. Rework adds further delays. This is simply unacceptable in today's on-line society.

6. **Failure to maintain and update the syllabus.**
   There has only been one significant update to the syllabus for the Foundation Licence and limited changes to the other grades and the regulations assessment. The current training organisation is no longer registered with any form of educational oversight organisation. As a result, there is no evidence that the standard and syllabi of the assessments are compliant with International standards (HAREC and CEPT). In addition, not only is the question bank dated but there appear to be many questions with errors or inconsistencies. Currently, only a single reviewer examines any complaints and concerns: alteration to erroneous questions is a very rare occurrence. There is no external scrutiny or audit of the question bank and concerns have been raised that it is regarded as secret. In other countries the database is in the public domain.

7. **The rise of Australians taking exams from other countries**
   There is a significant increase in Australians sitting for a US amateur radio licence, then achieving their Australian licence via reciprocal arrangement. This path is gaining favour because of the lower exam cost, shorter lead time and reduced administrative burden. (See http://www.veexams.com)

The reference to the irregular use of the reciprocal licensing path has been included here, not as a practice that should necessarily be halted, but because it serves to highlight the rising dissatisfaction with the existing system of obtaining an Australian qualification.

If essential efficiencies and simplification can be made to Australian Amateur licensing over the next twelve months, this alternative path for all but legitimate travellers would become redundant.

Nearly every comment submitted related to existing examination services and the inappropriateness of the RTO model for Amateur examinations because of its high cost, operational complexity and subsequent deterrence to new operators entering the hobby.

Suggested Amateur Radio qualifications proposal

The current training system is based on a VET/TAFE model. This is no longer appropriate as Amateur Radio is a hobby and not a vocation or a trade.

The UK operated a similar examination system to Australia for many years. Some time ago, the Radio Society of Great Britain (RSGB) recognised the old system's shortcomings and adopted a new arrangement in conjunction with the UK radio regulator, Ofcom.

The RSGB model is managed within the Sector and does not involve the expense and unsuitability of a VET Registered Training Organisation (RTO).

The UK model is detailed at:

http://www.rsgb.org/main/clubs-training

This suggested model satisfies the needs and aspirations of the Sector, those being value for money, responsiveness, accessibility and compliance. The delivery and regulatory platform has also been tested and proven in the UK.

RASA believes a model based on the UK experience would satisfy the regulatory requirements placed on the ACMA by the ITU, as well as meeting the expectations of the Sector and its stakeholders.

Appendix 1: Synopsis of broad feedback sent to RASA

There were three models presented as possible options within the ACMA consultation paper. All three focused on a requirement for a Registered Training Organisation (RTO) to take control of licensing arrangement via tender.

The third model described involvement with the Australian Skills Qualifications Framework (ASQF).

Most submissions to RASA were very critical of pursuing an RTO based model, which is widely regarded as placing considerable overhead and impost on candidates and very expensive to administer. The third ASQF option being the least favoured for the same reasons.

While engagement of an RTO may be appropriate for vocational training where the outcome is intended to create a commercial trade qualification, the RTO path is seen as a poor fit for the hobby of Amateur Radio. Amateur operators simply wish to communicate and conduct radio experiments for personal endeavours and fulfilment, which is a very different aim.

It is unfortunate that, historically, approaches to the provision of training for Amateurs have exhibited strong links to tertiary institutions. This approach has drawn Amateur Radio licensing, education and preparation into the machinery of VET and commercial education.

Other countries have not gone down this path and consequently their Sectors have much higher levels of access to the hobby than we enjoy in Australia. Some countries that used the vocational model have now moved away from this methodology for the reasons described herein.

A fundamental issue with using vocational training models within Amateur Radio is the total reliance of *volunteer* Assessors that are required to carry out a large amount of work and travel at the behest of a *commercial* RTO enterprise.

Unless the workload for volunteer assessors can be significantly reduced through automation and efficiencies, Assessor and candidate participation will continue to fall.

#001
- RTO's are unnecessary and that it could be administered by volunteer organisations

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#002
- Has concerns that with a non-RTO model it could be harder to guarantee integrity.
- (Upon further discussion with this person, he was shocked at the high costs of RTO accreditation and how this would affect the cost of exams)

- Issuance of callsigns should remain within the hands of the ACMA and licensing should not be contracted out.
- The ACMA has a good reputation for fairness and should be the preferred manager of all licensing and callsigns
- Examinations (as separate from training/learning), Licensing, Callsigns & Enforcement belong squarely within the ACMA's remit. Because of the not-for-profit nature of AR, putting these activities in the private domain is inappropriate.

Appendix 2: Synopsis of responses on improving examination efficiency.

This part of the submission provides feedback which goes beyond the initial question of which organisation should carry out the licensing work. It focuses on some of the ideas passed on to us that may increase efficiency and user-friendliness of the service provider. It is likely that this material will be of interest to a future Syllabus Review Panel.

A consistent response indicates a strong desire to see greater use of on-line technology in the conduct of Amateur exams. Long lead times for assessments could be shortened from weeks to days. Once identity and exam integrity have been assured, the exam processes can be largely automated. There are many examples of this already, such as car licensing skill tests and induction training at large plants.

Done properly, we have an opportunity to reduce costs for the service provider and improve services for the candidates. In addition, the frequency and accessibility of exam events by Assessors can be improved without compromising security, integrity and technical standards.

Key points for future exam efficiency

1. Keep exam costs to the absolute minimum.
2. Create a viable exam system that allows internet based exam events with just one authorised facilitator present.
3. Remove the necessity for the facilitator to be a member of any organisation.
4. Release the question bank into the public domain.
5. Allow successful candidates to get a 30-day temporary operator's license while the official version is sent via mail a few weeks later: similar to an insurance industry cover note policy on a car purchase.
6. Create a consultative process for the removal or repair of contentious or vague questions from the question bank

The following are a synopsis of submissions received by RASA. Not all opinions are supported by RASA, but they are all thought out positions that are worthy of inclusion in this report

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#001
This submission describes an operator working their way to the USA Technician level standard from within Australia so that they can bypass the increasingly difficult Australian system of exams. He wishes to obtain an Australian license via reciprocal arrangements.

- Submission complains about spurious questions in exams
    o Battery internal construction
    o Internal resistance, temperature coefficients etc.
- Suggests that fewer questions are more appropriate in Amateur exams
- More training on-line would be appropriate
- There is a need for better text books on Amateur Radio topics.

#002
Brief submission provided.

- Regrets that there is no pass mark given after an exam
- Supports on-line exams in the presence of a facilitator
- Believes that the focus should be on getting people on-air with some basic tech understanding.

#003
Extensive submission provided

- The exam process should be more inviting for people interested in the hobby.
- Greatly dislikes progressive course work models as a path to a license.
- Wants to consolidate Standard and Advanced licenses into a single syllabus and exam with two pass thresholds.
- A facilitator with appropriate passwords can log-in and instigate an exam at any time
- Internet based exams using webcam to record identity of facilitator and candidate.
- Concept discussed for granting a callsign and 20-day license after an exam pass while waiting for the final version to arrive.
- Describes necessity for reduced work by the facilitator/Assessor and need for reduced costs to stage an exam
- Describes consultative mechanisms and forums to review and improve the question bank at 6 month intervals.
- Would like to see the question bank placed in the public domain.
- Improve the relevance of exam questions to what is important for new operators.
- Describes need to improve exam consistency (presently there are 'good tests and bad tests being presented to candidates)

#004
An operator who obtained their license in the USA then came to Australia is critical of Australian exam methods because of the bureaucracy and expense here.

Also observes that the impost on the person conducting the exam is awkward and unnecessarily onerous. Australian Assessors have to work too hard as volunteers.

#005
A candidate that passed through the Australian exam process over the past two years discusses and criticizes the high cost and difficulty in finding exam services willing to carry out a test.

- Suggests that a streamlined method, closer to hazards testing with car licenses would be more in-line with the requirements to enter the hobby.
- Suggests a simple structure where the candidate only pays when they succeed in the exam.
- Suggests supervised internet-based exams
- Suggests that the question bank should be in the public domain and not be kept secret.
- Sums up by saying that it is essential to make the exam process cheaper and easier if the hobby is to survive.

#006
An amateur submission suggests that the RTO model would be effective if a self-marking computer driven exam process were to be used.

- Some strategies for exams to be conducted remotely are discussed, via Skype etc.
- Suggests that the exams themselves could be managed directly by the ACMA
- Certificates of Proficiency could be generated and distributed by the RTO group supervising the exam process.

#007
A frank discussion that compares the Australian with the American exam experience.

- There is a belief that training and study is entirely the domain of the candidate and that it is their responsibility to reach the necessary standard.
- A strong opinion is expressed that exams should not be a monopoly and that a more transparent system should be in place. (agreements between the ACMA and service provider should be public)
- Exam costs are already too high and in-line exams are the way to go.

#008
This submission describes the personal experience of an assessor trying to conduct exams on a regional area and describes the difficulties arising from a two-assessor role.

- The primary claim is that several people in this person's area wanted to apply to be an assessor, but they found it was all too hard to reach this status, including the compulsory monopoly requirement to be an Assessor. (which costs the volunteer an extra $95 per year for the privilege of doing the work.)
- The nearest alternative assessor to assist is an hour's drive in one direction or 3 hours' drive in a different direction, which is unrealistic.
- Feels strongly that any future system should be reliant on only one assessor to be at each exam event. **The same person also conducts exams for marine radio licenses where only one invigilator needs to be present.**

- If an assessor is not actually working with children, then why is 'Working with children' certification essential?

Note: a complete list of all submissions and content from Sector participants can be provided on request