ACMA RELEASES THEIR VISION FOR THE FUTURE OF AMATEUR RADIO IN AUSTRALIA

Just as the August QTC was about to be finalised, the ACMA circulated three news updates that will shape the future of Amateur Radio. In February 2024 the current arrangements with the Australian Maritime College (AMC) will cease and the ACMA have announced they will use that date to transition from Apparatus Licences to a Class license. This represents the largest structural shift in Amateur Radio management our hobby has seen since WW2.

On the 29th August a bulletin was released by the ACMA describing their vision of how the examination and assessor network will operate. They seek feedback on their plan before a deadline of the 26th September.

Five minutes later, the ACMA released a second bulletin describing their proposed fee structure for accreditation, qualification and callsign management. This release also seeks sector feedback by the 26th September 26.

The following day, the 30th August, the ACMA released a third document describing changes made to Scientific and Research licensing. This is intended to accommodate Amateurs who wish to operate and experiment with higher power levels.

There is a lot to unpack here. We delayed QTC to include a synopsis of this content and to discuss some of the ramifications of these potential changes.

Links
There is a lot of content in these proposed changes. Readers can follow the links supplied by the ACMA if they wish to read the ACMA position in greater detail.
The links are shown here in full:

Assessor Accreditation and Qualification framework & Class License Arrangements:
Proposed new amateur radio assessor accreditation and qualification framework | ACMA

Draft Fees & Cost Recovery Implementation Statement consultation
Proposed 2023–24 fees for service | ACMA

Notice of the introduction of Science & Research Class License legislation
https://www.legislation.gov.au/Details/F2023L01122

What does it all mean?

RASA has prepared a synopsis. Where appropriate, we have added some notes and interpretation from the RASA Management Team.

We will also prepare a response to the consultation. We invite Amateurs to send comments about these changes to RASA via vkradioamateurs.org. Alternately, you may wish to upload your own submission to these proposals directly to the ACMA, or send by post to the ACMA at:

Manager – Revenue, Cost Recovery, Budgets and Operations,
Australian Communications and Media Authority,
PO Box 78 Belconnen ACT 2616

Some comment on the process.

We have mixed feelings about the way in which this matter has been handled. The Class License proposal had been in the pipeline for a few years now. It has been delayed by the ACMA more than once.

We have a lot of material, all provided with only twenty five days for Sector consultation and a meaningful reply back to the ACMA. In just over three months the new arrangements will take effect. It is an ambitious timeline.

We understand that the AMC contract will end in February 2024. The ACMA will asume responsibility for all services as well as implementation of the new arrangements within this transition period.

It is fair to give credit to the ACMA where it is due. They received notice that the AMC elected not to renew the contract for Callsign Administration and Examination Services.

The ACMA recognised that there was no competent organisation with the capability to carry out these tasks and decided to do the work themselves. They have consulted at length and have received a large number of replies.

They have reached out to the Assessor network and have designed a new structure, which from their perspective balances the needs of the sector with the resources they have available.

The proposal documents are (mostly) clear, well written, and address many of the concerns raised by the sector. Thus far, the ACMA appears to be allocating the resources necessary to complete this transition.

While there is still need to fine-tune the model, had the ACMA not taken the matter seriously, the outcome for Amateur Radio could have been sub standard. The ACMA deserves some credit for their forward thinking initiative.

Here are relevant extracts from the ACMA proposal:

Class Licensing and Supporting Arrangements

We plan to implement the proposed class licence to authorise the operation of amateur stations in December 2023, to commence in February 2024. We plan for the amateur class licence to commence at the same time as the proposed new amateur radio qualification arrangements and the application component of the assessor accreditation scheme.

The proposed class licence, if made, will authorise the operation of amateur stations by amateurs who hold recognised qualifications at the foundation, standard and advanced level. It will replace the need for apparatus licences to be issued for such stations. The class licence will also authorise the operation of amateur stations by overseas visiting amateurs with recognised overseas qualifications and licences. Repeater and beacon stations will continue to be authorised under apparatus licences.

We intend to make minor changes to the draft class licence when it is made, including:

- changing the proposed definition of pY to rely on the definition in the Radiocommunications (Interpretation) Determination 2015
- adding a provision about the use of amateur stations in emergency services operations and training
- adding a provision about restrictions on connection to a public telecommunications network
- adding a note about the use of the AX call sign on specified dates.
- The class licence will also provide for the following:
- new qualification regime
- assignment of call signs by the ACMA, including specifying that call signs can be assigned for a time period and can be renewed
- power for the ACMA to declare recognised qualifications.

Comment
For the most part, this is a confirmation that the Class License template will maintain most of the conditions that currently exist within our Apparatus License. The AX callsign usage changes have not been detailed and require further consultation.

Electromagnetic Energy Regulation
We are not intending to make changes to the categories of station that are considered low-risk. This is for two reasons: Firstly, the categories of low-risk station in the updated draft class licence are the same as the 'Level 1 criteria' stations in the Apparatus Licence Condition Determination (LCD).

We do not consider it appropriate to create different EME obligations depending on whether an amateur station is operated under a class licence or under an apparatus licence.

Secondly, we do not consider that relying on an individual's assessment of whether a member of the public is within 5 m of an amateur station is a suitable risk management strategy.

While we recognise that some submitters are concerned about how the EME requirements will work in practice, we note that the proposed introduction of the amateur class licence does not impose additional EME obligations on those amateur operators who currently hold non-assigned amateur licences.

Comment
This appears to be confirmation that existing EME policy will remain unchanged.

Amateur Radio Fees
The ACMA recently concluded consultation on the draft 2023–24 Fees CRIS on 7 July 2023, in which no changes were proposed to the ACMA hourly rates or current charges implemented on 1 October 2022.

The methodology for the calculation of the new charges is based on the ACMA's hourly rate for services, multiplied by the estimated time taken to conduct the activity. The hourly rate used for the 2022–23 review was based on the net cost of services, which represented the actual costs incurred by the ACMA in executing its functions and activities for the 2020–21 financial year.

However, there are new changes proposed to the amateur radio framework and AWRL applications as indicated below:

Amateur radio:
We are consulting separately on proposed new amateur radio qualification arrangements and assessor accreditation scheme. Under the new arrangements, we intend to cost recover the ACMA's costs for issuing ACMA recognition certificates, assessing applications for recognition of prior learning, and assigning call signs.

Comment
There is a lot of detail in the proposed changes to the charging regime. The ACMA proposed fee schedule is a calculation of time taken to process an application, multiplied by their hourly rate of $226 per hour.

We have prepared a synopsis of these fees in the table below:

Application for a Recognition Certificate for Advanced, Standard & Foundation)	$45.20
Application for Recognition of prior learning Certificate (via HAREC certification)	$75.35
(other than HAREC certification)	$188.35
Application for Next Available Callsign	$30.15
Application for specified 3-letter callsign (conditions apply)	$41.45
Application for specified 2-letter callsign (conditions apply)	$52.75
Application for Special Event callsign (conditions apply)	$52.75

Reciprocal licensing arrangements for overseas amateurs operating in Australia
We proposed to extend the period of time that overseas visiting amateurs holding recognised overseas qualifications, who are currently operating under the Radiocommunications (Overseas Amateurs Visiting Australia) Class Licence 2015 (the Overseas Class Licence),

are authorised to operate a station while relying on their overseas qualifications – from up to 90 days to up to 365 days. This is reflected in the updated draft class licence. This would align the period of time that all overseas amateurs holding recognised qualifications or licences are authorised to operate amateur stations in Australia relying on those qualifications or licences

If overseas qualified amateurs stay in Australia for longer than 365 continuous days, they would be required to obtain an Australian qualification and call sign to be authorised to operate an amateur station under the proposed amateur class licence.

Comment
The ACMA maintains the position that in the long term, Amateurs in Australia are required to pass Australian exams. Foreign visitors can operate in Australia for up to one year under existing arrangements.

This policy aligns with the position RASA submitted three years ago. The ACMA included a statement that they will continue to recognise overseas qualifications used to obtain Australian licenses that were issued before September 2019.

Applying standards to Amateur Radio Equipment

What stakeholders told us
A few submitters responded on this topic. Submitters raised concerns about the applicability of standards to amateur equipment, given the experimental nature of the amateur service. In particular, that amateur operators' possession and operation of transmitters is not covered adequately under the current arrangements.

Our response
We consider that the current application of the Equipment Rules to amateur equipment remains appropriate. While we appreciate the experimental nature of the amateur service and that amateur operators do make changes to their amateur stations, the Equipment Rules apply to most radiocommunications devices, including amateur stations, unless a permit has been granted or an exemption applies.

Comment
Existing regulations are provided for all Amateur Radio equipment, including home-brew or modified equipment.

The ability to build and modify our equipment is a fundamental part of our hobby.

It is our understanding that the status quo for equipment standards will remain unchanged.

Callsign transfer and Trading
We propose to implement the arrangements that we outlined in consultation paper – an amateur operator can surrender a call sign and nominate another person to whom the call sign could be issued. We also plan to place a limit on the number of call signs held, which is detailed below.

We intend to include more details on both of these arrangements in the call sign policy document discussed below.

Comment
This policy is self-explanatory. They will permit Amateurs to pass callsigns onto another designated person. There had been concerns that some may hoard callsigns or sell them for profit. There will be no change here. The cash for callsigns concern has not been addressed.

A 'regular check' on call sign use
We proposed a requirement for a call sign entity to issue a 'regular check' to confirm whether amateur operators were using their call signs.

In response to the feedback we received, we will carry out a regular check as proposed.

However, we recognise that concerns about call sign use may be greater for some types of call signs than others. We will therefore take a nuanced approach.

For special event call signs, we will conduct a check every 12 months. In practice, this will likely occur around every 9 months, when an amateur operator is provided with the opportunity to renew a special event call sign.

The VK0 and VK9 call signs will also be subject to a 12-month check. For 2-letter and 3-letter call signs, the check will be conducted every 5 years. However, we will be flexible with our timing. If we consider that demand and supply issues are emerging for some types of call signs, we will review the matter.

Comment
This is a logical progression for Class Licenses. Without annual renewals, the pool of available callsigns may be exhausted as people drift out of the hobby, or die. We agree with ACMA's proposal on a periodic check on the Amateur's callsign status.

Limit on the number of call signs held
We propose to introduce a policy to limit the number of call signs that any one person (including a body corporate) can hold. The ACMA's policy will be outlined in our call sign policy document that we intend to publish before the class licence commences. We intend to generally apply to 4 types of call signs:

Special event call signs.. a person should ordinarily be assigned no more than 2
VK0 and VK9 call signs - no more than 1
2-letter call signs - no more than 5
3-letter call signs – no more than 5.

The policy will not apply retrospectively. However, the proposed amateur class licence contains specific provisions about the cancellation of call signs, and we may decide in particular cases to exercise this power.

Comment
This arrangement seems reasonable. It leaves the ACMA with flexibility. It is our expectation that 'body corporate' is referring to a legitimate radio club.

Call sign assignment
As discussed in the August 2023 consultation paper, we will remain the entity solely responsible for assigning Australian amateur call signs – i.e., we are not implementing the proposal we consulted on, that a third party could become the 'Call Sign Entity'.

We will publish a document outlining the ACMA's policy on call sign arrangements before the class licence commences. It is intended to largely replicate the current call sign policy, outlined on the AMC website, with an updated policy to be published on our website.

Amateurs with a recognised qualification may apply to the ACMA for a call sign. We will consider the application and be guided by the call sign policy.

The call sign policy will outline changes to some policy positions outlined in the class licence consultation paper, including that on the policy about the number of call signs a person can be assigned.

Comment
The AMCA are stating they will maintain exclusive control over callsign allocations.

How will we know who is licensed and who is not?
Most submitters were concerned that amateur station information would not be included on the Register of Radiocommunications Licences once the class licence commenced.

Various reasons were put forward as to why some form of register was required. These included the need for a central repository to which amateur operators could refer to check the bona fides of call signs and qualification levels. Another reason was so that the amateur service could self-manage interference.

Submitters also pointed out the limitations of voluntary registers, including accuracy of the data.

Our response
We recognise the importance of this issue to amateur operators. Consequently, as stated in our August 2023 consultation paper, we will maintain a register of assigned call signs and a list of available and reserved call signs on our website. This will be available when the class licensing arrangements commence, planned for February 2024.

The register will detail:

- the call sign
- whether the call sign is assigned, available or reserved
- if assigned, the qualification level of the amateur to whom it is assigned.
- Personal details of amateur operators will not be available.

Operation under the amateur class licence means that an amateur operator acknowledges that their call sign and qualification level are available on the ACMA's call sign register.

Comment
Most Amateurs will probably view this position with some relief. ACMA will maintain a public database.

There is no indication of whether permission will be granted to download the data and use it for statistical, commercial or other purposes. RASA will seek clarification.

Amateur operating procedures
What we said
We reiterated our initial proposal to only include conditions in the proposed class licence that relate to the ACMA's spectrum management functions and responsibilities. Other aspects of amateur radio operation would be set out in amateur operating procedures that would be for the amateur community to develop and manage.

What stakeholders told us
We received only a couple of comments on this topic. One submitter recommended that the ACMA maintain ownership of the amateur operating procedures, which form part of the Amateur Operator's Certificate of Proficiency (AOCP) syllabus for the practical examination.

Another submitter also advocated for a definitive reference for operational protocols for individuals preparing for examinations.

Our response
We propose to retain the amateur operating procedures on our website. We will update the amateur operating procedures (and syllabi) to incorporate the new class licensing and qualifications terminology.

Comment
RASA agrees with the ACMA's position that they will retain a copy of operating procedures on their website.

Arrangements for amateur clubs
We proposed that the operation of a club station would be authorised by the class licence, provided the operator of the station is a qualified operator or is supervised by a qualified operator. A call sign may be issued to a club that is a body corporate.

A person operating an amateur station may be able to transmit the club call sign if they are a member of the relevant club, or they could elect to transmit the call sign that is assigned to the individual operator – or both their call sign and the club call sign.

We recognise that an amateur club is not a natural person and therefore cannot hold a qualification. Our proposed call sign policy document, referred to above, will include information for clubs about call sign applications.

For example, consistent with existing requirements for the issue of an apparatus licence, only natural and legal persons will be assigned a call sign. We will therefore require proof that the club is a legal person.

We will also require proof that the appropriate person applying for the call sign is the holder of an advanced-level qualification.

Comment

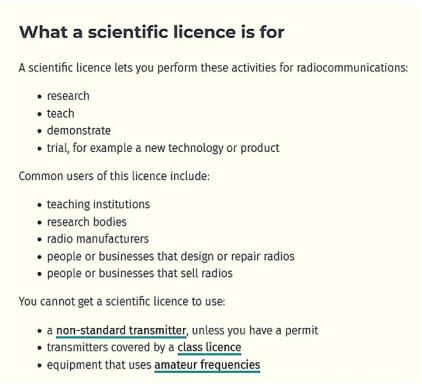
As near as we can tell, the ACMA intends to maintain the status quo for Club Callsigns, in that a responsible Amateur must be present and that all operations will be limited to the grade of license of that responsible person.

If this summation is correct, then the approach is satisfactory, although we do query the inclusion of the requirement for the applicant to hold an advanced qualification. **This is not the case at present.**

It would be appropriate to determine the applicant's bona fides, e.g. Is the club a "legal person", and is the applicant authorised by the club to apply on its behalf?

There is no technical skill or knowledge involved in applying for a callsign. The safeguard is in the requirement for the station to be operated by a qualified person. We suggest that the applicant hold any Amateur Radio qualification.

How does the ACMA propose to determine if a club is a "legal person"?



What a scientific licence is for

A scientific licence lets you perform these activities for radiocommunications:

- research
- teach
- demonstrate
- trial, for example a new technology or product

Common users of this licence include:

- teaching institutions
- research bodies
- radio manufacturers
- people or businesses that design or repair radios
- people or businesses that sell radios

You cannot get a scientific licence to use:

- a non-standard transmitter, unless you have a permit
- transmitters covered by a class licence
- equipment that uses amateur frequencies

Responses to submissions on high power operations

Before breaking down this topic, some background is in order. RASA has lobbied the ACMA for three years to increase advanced licensee priveleges from 400W to 1KW PEP. Responses to our proposal have been deferred several times.

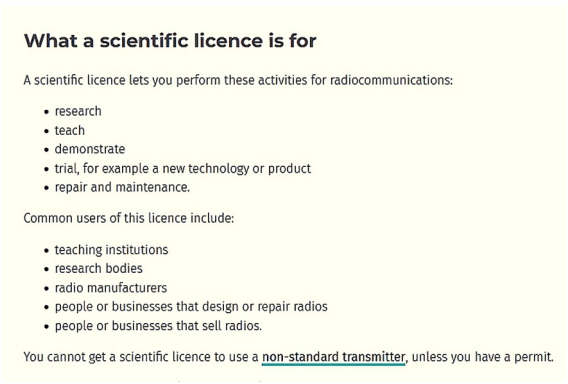
Within these submissions, evidence has been supplied showing the low impact experienced by many other countries that have authorised higher power levels by Amateurs.

In addition, RASA submitted a detailed paper confirming no reported impact to human well-being where 1KW transmissions are permitted. Before expanding further on this reasoning we must examine the direction that the ACMA is taking.

The ACMA appear keen to pursue a hybrid solution where some amateur operations would be migrated to Scientific & Research licenses requiring separate approvals from Accredited Persons and annual license fees.

RASA has already stated that this strategy is inefficient and unfit for purpose. The commercial objectives of a research license are inconsistent with Amateur Radio and there is no other country that has used commercial research frameworks for Amateur Radio.

Below are two extracts from the ACMA website.
The text on the left was taken on August 29.
The text on the right was taken on August 30
This document describes the commercial and research nature of scientific licenses. Note that the document on the left has very specific exclusions for Class License transmitters and Amateur Radio frequencies. On the following day the revised page has these two limitations deleted.



What a scientific licence is for

A scientific licence lets you perform these activities for radiocommunications:

- research
- teach
- demonstrate
- trial, for example a new technology or product
- repair and maintenance.

Common users of this licence include:

- teaching institutions
- research bodies
- radio manufacturers
- people or businesses that design or repair radios
- people or businesses that sell radios.

You cannot get a scientific licence to use a non-standard transmitter, unless you have a permit.

There is an apparent desire to shoehorn aspects of Amateur Radio into the commercial Scientific License framework when class licenses are implemented. This action is occurring outside of the consultative process currently underway.

Here are extracts of what the ACMA have said in their Response to Submissions:

In the September 2022 consultation paper, we outlined our position to authorise high-power operations by advanced level amateurs on a case-by-case basis. This included the proposal for advanced level amateurs to seek authorisation to use high-power for scientific and experimentation use-cases in the short term, and to consider high-power operations for other purposes in the medium- and longer-term.
We proposed that advanced amateurs may apply for assigned scientific licences for certain experimentation uses, including reflecting signals from a celestial body, as well as intercontinental ionospheric and trans-equatorial propagation experiments. The consultation paper also requested suggestions for other amateur experimentation uses that require high-power that should also be considered under assigned scientific licensing arrangements.

Some opposition to the use of scientific licensing was based on a misunderstanding about the scientific licensing proposal. Submitters assumed that the scientific licence was intended to be used for all amateur usecases including communication with other amateurs and all (non-high power) experimentation.

Amateur operators may apply for assigned scientific licences for certain experimentation uses. This includes for activities such as reflecting signals from a celestial body, intercontinental ionospheric and trans-equatorial propagation experiment. We will publish guidance on the ACMA website in relation to the use of assigned scientific licensing arrangements to authorise the operation of highpower amateur stations.

Power increase for other amateur levels
Although the consultation paper did not raise this topic, several submissions suggested that we should consider increased power (proportionate) for all amateur levels.

Suggestions for foundation power level ranged from 30 W to 200 W. Suggestions for standard level ranged from 400 W to 500 W. Reasons given to support an increase for foundation and standard were for parity with equivalent licence levels overseas, to prevent being overwhelmed by stronger stations and to facilitate and encourage experimentation.

Submitters considered that high-power was needed for communication with amateurs outside Australia and to compete with international stations during HF contesting.

This was due to the distances involved and that many overseas amateurs operate on power levels greater than 400 W. As HF propagation conditions vary frequently and significantly, it is not possible to maintain a satisfactory/reliable service on 400 W.

Many submitters also identified a need to overcome a rise in the noise floor from domestic appliances and power lines.

Submitters generally opposed high-power in VHF and UHF bands. This was due to EME safety concerns and the potential for interference.

Interference
Submitters considered that there was a low-risk of interference from high-power operation in HF bands. While there was a potential risk in VHF and UHF bands, they claimed this was not established.

Comment
There is much to unpack here and we have not reproduced all of the stated arguments. At the end of this section the ACMA document furnished a particularly vague summary.

Our response: We intend to work through mechanisms and arrangements that could be put in place for a medium-term high-power authorisation. We will communicate next key milestones and proposed timing in the draft FYSO 2024–29.

Comment
The ACMA appear to have already made up their mind on this topic. In the bulletin released just one day after the above response they published the following statements:

The ACMA considers that any granting of higher power should be on a case by case basis – for example, through an apparatus licensing arrangement – and the ACMA is not inclined at this time to permit higher power operation under class licence arrangements.

Such case-by-case authorisations would involve a person applying to the ACMA for permission to operate a higher power station.

Interference and EME compliance risk would be assessed before approval. We consider that it should be incumbent on applicants to undertake their own due diligence (and bear application costs) for the interference, EME and EMC risks associated with their higher power licence. We would likely require independent assessment of interference potential and EME compliance.

Comment
RASA has lobbied the ACMA for several years now on higher power for Advanced Amateurs. The existing licensing framework and syllabus are adequate for this purpose. The Advanced Syllabus is aligned with the CEPT standard which permits amateurs at this level of competence in many other countries to operate higher power at limits (1-1.5KW) specified by their regulators.

As noted elsewhere, RASA has submitted a detailed technical paper highlighting the lack of any reported impact to human wellbeing where 1KW is permitted.
This paper can be seen HERE.

This conservative position taken by the ACMA has not acknowledged the evidence demonstrating the low risks associated with the proposed higher power levels. The candid reality is that hundreds, if not thousands of 1KW+ power amplifiers are regularly being used by Amateurs hin Australia, and this has been the case for decades. That the ACMA appears to be unaware of the extent of this usage simply reinforces the benign nature of the technology currently in common use.

It is well known within the Amateur community that those wishing to use higher power (1KW+) do so, and this is evidenced in contest entries, casual discussions at club meetings and reference to amateur radio websites such as qrz.com.

We also note that the UK are undertaking a consultation on the same topic and there appears to be support for higher power.

We invite the ACMA to discuss the practicalities of higher power operation with the Presidents of the WIA and RASA at their next joint meeting.

It is possible that the ACMA has not adequately considered in-context the true duty cycle of transmitter equipment when used by Amateur operators. Most commercial and broadcast services are AM/FM broadcasts or digital transmissions that approach a 100% duty cycle. Such transmissions should be treated with respect.

However, the duty cycle of Amateur Radio transmission are typically between 25-45%. In real terms, the risk of exposure to high duty cycle RF fields is minimal.

Indeed, the ACMA's own guidance assumes 100% duty cycle and only calculates exclusion zones above 30MHz.

https://www.acma.gov.au/our-rules-eme

The practical reality, as demonstrated by local Amateur radio activity, as well as in numerous other countries, including our immediate neighbours, is that higher power at HF has no proven negative impact on human wellbeing or EMC considerations for Amateur Radio or other services.
Further enquires are being made with the

ACMA on this topic.

Fundamentally Amateur Radio is not a commercial activity and Scientific Licenses are inappropriate. Advanced Licensees have already satisfied the technical requirements (CEPT compliant syllabus) to safely operate higher power at HF.

Implementing the Class License
We intend to make the proposed class licence to authorise the operation of amateur stations in December 2023. We plan for the amateur class licence to commence in February 2024, at the same time as the proposed new amateur radio qualification arrangements and assessor accreditation scheme.

All qualified amateurs will be authorised to operate under the proposed class licence, even if they hold an amateur licence, as long as they comply with its conditions. Non Assigned amateur licences will continue in force until they expire, or they can be surrendered. If you surrender your licence, you may be eligible for a partial refund of the transmitter licence tax.

Upon the class licence's commencement, the ACMA intends generally not to issue new non-assigned amateur licences, and to not to renew existing licences. We are considering making an instrument under section 103A of the Radiocommunications Act 1992 to prevent renewal of existing licences (see August 2023 consultation).

Transition letter
To assist in a smooth transition to class licensing arrangement, around a month prior to the class licence's commencement, we will send all current non-assigned amateur licensees a letter that will confirm whether they are authorised to operate under the class licence and include their qualification level and call sign (transition letter).

The ACMA intends that the transition letter can also be used for advanced amateurs travelling overseas to demonstrate to that overseas jurisdiction their ability to operate an amateur station in Australia.

Our preference is to send the letters by email wherever possible. Where we do not have an email address, we will send the letter by mail. We therefore encourage each licensee to make sure that we have a current email or postal address for you.

If there is any doubt, or to update your details, please check your details on ACMA Assist, or you can contact our Customer Service Centre by email at info@acma.gov.au, or phone 1300 850 115.

ACMA recognition certificates
After commencement of the proposed amateur class licence, we will be issuing new qualifications. These will be ACMA recognition certificate (Advanced), ACMA recognition certificate (Standard) and ACMA recognition certificate (Foundation).

Public register
We will maintain a register of assigned call signs and a list of available and reserved call signs, on our website. This will be available at the same time as the class licence commences.

The register will detail: the call sign, whether the call sign is assigned, available, or reserved.
If assigned, the qualification level of the amateur to whom it is assigned.

International reciprocity arrangements
For amateur advanced operators, the letter of confirmation referred to above will include text that meets CEPT Recommendation T/R 61-01 requirements.

We will notify the CEPT that, on its commencement, the proposed amateur class licence will authorise the operation of non-assigned amateur stations in Australia.
We will also notify CEPT about the ACMA recognition certificate (Advanced) referred to above.

Comment
These proposals are reasonable mechanisms to transition licensees from the existing Apparatus License to the Class License.

New amateur assessor accreditation scheme and qualification framework
We are proposing a new qualification framework that will retain the current qualification levels – foundation, standard and advanced. It will also continue to recognise qualifications that were obtained or recognised under the current framework.

Qualifications, called 'ACMA recognition certificates' under the new framework, will be issued by us. This will be on application from a person who has passed a relevant amateur radio examination or recognition of prior learning (RPL) assessment. The new framework also outlines a process where amateur operators can have their internationally obtained amateur radio qualification recognised through RPL.

We propose to use a network of voluntary assessors to conduct amateur radio examinations under a new scheme to be managed by the ACMA. These assessors will be suitably qualified, experienced amateur operators who meet various requirements.

The consultation paper includes draft Accreditation (Amateur Radio Examination) Rules 2023 (the draft Accreditation Rules). These will provide a formal accreditation framework for amateur radio assessors and outline requirements to become an assessor.

We have also drafted Accredited Assessor Guidelines, which contain operational and conduct requirements for assessors. We propose to commence some aspects of the Accreditation Rules during December 2023. This will allow us to bring current AMC assessors on board prior to the class licence commencement.

We plan to start accepting new applications from those seeking to become an accredited assessor from February 2024.

Comment
This new Assessor Accreditation scheme is necessary as ACMA transitions from the 3rd party model administered by the AMC. There is too much detail to unpack in this edition of QTC. What is critical is that the existing pool of accredited assessors are properly informed, managed and appreciated by the ACMA. They perform an important task for free; a cost that would otherwise impose huge fees on the Sector..

The ACMA must continue to liaise with and listen to the assessors. These are the volunteers who perform the work and provide the pathway to Amateur Radio for newcomers. Provided the ACMA continues to consult with and accommodate the assessors and students, the future of Amateur Radio is assured.

Summary
In this synopsis we have focused on the key aspects of ACMA's Consultation Papers.

The process the ACMA has undertaken to implement Class Licensing is for most part a reasonable and structured approach.

We remain extremely concerned at ACMA's attempts to shoehorn certain privileges into the Scientific Licence regime, and a continued delay to approving higher power for Advanced Licensees.

As a National Representative Body, RASA welcomes feedback from the amateur community.

The turn-around time for this consultation is tight. If you wish to send your response on any or all of the issues, you can send it to info@vkradioamateurs.org

Alternatively, you can use the ACMA's direct, online response page.

The Radio Amateur Society of Australia