



*The Radio Amateur Society of Australia inc.*



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## RASA RESPONSE TO ACMA CONSULTATION PAPER , September 24, 2023

ACMA Consultation Title:

*Proposed amateur radio qualification and assessor accreditation arrangements August 2023*

The ACMA supplied the following template for stakeholders to provide comment upon their proposals, to be uploaded before September 26, 2023. The RASA response is a compilation of consultations from the RASA board, Feedback from some radio clubs (able to respond within the short time frame) and individual comments supplied by RASA members.

In this document we have provided feedback comments in the order of the template supplied.

The ACMA supplied the following questions:

### **Issues for comment**

**We are seeking feedback on the proposed new qualification framework for amateur radio and the associated accreditation scheme, as well as the draft 2023–24 Cost Recovery Implementation Statement (CRIS).**

We welcome comments on the below questions and towards any issues addressed in this consultation paper. For ease of reference, the questions are listed below.

1. Do you have any comments on the proposed qualification framework outlined in **Attachment A**?
2. Do you have comments about the development and implementation of a wholly online system for examinations and qualifications in the future?
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?
4. Do you have any comments on the Accredited Assessor Guidelines at **Attachment C**?
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?
6. Do you have any comments on the proposal to recognise Harmonised Amateur Radio Examination Certificate as a 'recognised qualification (Advanced type)'?
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?
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?
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?

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?

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?

## RASA Consultation responses follow:

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

On **Apparatus Licensing – Beacon and Repeater stations**, The outlined procedures are acceptable and consistent with previous processes.

We note that previously applicants for repeaters were required to seek approval from the Wireless Institute of Australia (WIA) before submitting repeater applications. This aspect was deemed unacceptable by the majority of Amateurs who have referenced this subject. The burden of seeking approvals from the WIA, was highly problematic because ;

(A) The WIA has no clear mandate to represent all clubs and individuals in Australia in this matter.

(B) RASA has received considerable feedback from clubs and individuals where the WIA's past performance in this role has been poor, including, but not limited to :

- Unreasonable response times (up to a year) were cited.
- Prioritisation of responses appeared to have been based upon personal relationships over sequential assessment.
- Cases cited where the WIA made unauthorised changes to applicant submissions without applicant consultation.
- Lack of transparency in the process and policies applied to applications.

It is RASA's position that persons or groups be able to make repeater/beacon submissions to the ACMA directly, following consultation with an approved frequency assigner.

RASA agrees with the outlined procedure of **ACMA Recognition Certificate** for Repeater/Beacon applicants

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RASA is satisfied with **the Radiocommunications Accreditation (Amateur Radio Examinations) Rules 2023 – Accreditation Rules** as outlined in the **Draft Qualifications and Assessor Accreditation** Document.

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RASA is generally satisfied with the **Amateur Radio Qualifications** strategy as outlined in the Proposed **Qualifications and Assessor Accreditation** Document.

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RASA is satisfied with the **Examinations** model and issue of **Recognition Certificates** as outlined in the Proposed **Qualifications and Assessor Accreditation** Document.

Feedback from approved Assessors under the existing AMC framework indicate that their biggest issue was their inability to provide timely feedback to the candidate of a positive or negative outcome at the exam event, or their ability to provide (general) feedback on areas where candidates need to improve competency. Under the new proposed model, this difficulty would be alleviated. This change is likely to be well received by the Assessor network and supporting clubs.

Where the ACMA lists the qualified assessors on their network, it would be useful to candidates if this information also appeared in map form. This would have two important advantages.

- (1) Candidates could more easily ascertain the closest assessor to their location
- (2) Areas where few or no assessors are available may be more easily identified, providing an incentive for active groups in those areas to encourage expansions to the Assessor network.

**Standard Exams:** Note that an alternate model for the consolidation of Standard exams within Advanced exams has been included in this submission. (Refer to our proposal in **Question 7** of this document) This strategy would have ramifications with any transition toward digital exams in the future.

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

RASA supports an eventual transition towards online exams.

We acknowledge the short time frame in which the ACMA has to transition to the new class license framework and this may affect implementation of an on-line exam strategy, but believe there is an advantage to proceed with this strategy when practicable.

- (1) This would remove the reliance and inherent delays with postal correspondence between assessors and the ACMA.
  - (2) Improved exam access would be well received by persons contemplating entry to the hobby.
  - (3) Preparation and completion time of an exam would be reduced where physical papers do not need to be manually prepared and checked.
  - (4) The process of marking exams would be significantly faster, with reduced likelihood of error. Time taken to process multiple candidates at the same session has been an issue. Online processes would be quicker and examination events may be more spontaneous.
  - (5) This should result in a reduction of ACMA workload and reduce response times for callsign delivery to successful candidates.
  - (6) Vastly improved statistics on candidates performance, question selection, and feedback to education providers and assessors on technical areas requiring greater focus during training.
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## 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?

RASA is satisfied with the **Accreditation Process** and **Conditions of Accreditation** as outlined in the Proposed **Qualifications and Assessor Accreditation** Document.

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

RASA is satisfied with the **Accredited Assessor Guidelines** as outlined in the Proposed **Qualifications and Assessor Accreditation** Document.

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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?

RASA is generally satisfied with the **Recognition of Prior Learning (RPL)** processes as outlined in the Proposed **Qualifications and Assessor Accreditation** Document. However, RPL should only be recognised where the candidate had undertaken an exam in their own country with similar depth and scope as the Australian requirements.

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

RASA is generally satisfied with the **HAREC** processes as described.

HAREC recognition may be applied where a country maintains license conventions with close equivalence to Australian requirements. For example, Amateur exams in the USA follow an examination template quite different to the Australian format, therefore USA Amateur **General & Technician** license holders should not be considered under this framework.

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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?

Yes, RASA proposes the following enhancement to the Standard examination process:

**STANDARD & ADVANCED EXAMINATION CONSOLIDATION PROPOSAL**

- There are presently three license levels. **Foundation, Standard and Advanced**. Currently the **Standard** and **Advanced** exams are entirely separate exams extracted from entirely separate question banks.
- Over the years the **Standard theory syllabus** has progressively matched the **Advanced theory syllabus** for content, with the main difference now being between the degree of difficulty of questions that are presented to the candidates.
- We propose that the **Foundation** exam content & difficulty and the **Advanced** exam content & difficulty to remain the same.
- **We propose that the Standard exam & question bank be discontinued**. Instead, candidates wishing to obtain a Standard license would henceforth attempt the Advanced exam, but would only be required to reach a lower pass threshold than the Advanced 70% pass level. Some conditions to apply.

**The reasoning for this proposal is as follows:**

- Candidates would no longer need to decide whether to sit for the **Standard** or **Advanced** or **Both** when attempting upgrades. With this model candidates can attempt one exam where a reasonable pass mark (say 60%) would result in a Standard License and the existing higher threshold of 70% would allow the achievement of an Advanced license. In a 50 question multi-choice exam this would be 30 and 35 questions respectively.
- This approach would save candidates time and money in their upgrade path.
- Assessors would have to prepare and dispense only *Two* different theory papers at exam events, not *Three*, as is currently required.
- This would reduce ACMA workload, as maintenance and distribution of the Standard exam question bank would no longer be required.
- If there is a future migration to a Digital Exam model, the ACMA would not need to prepare both Standard and Advanced digital exam platforms, with two question banks. The ACMA and Assessors would create only one exam platform for both standards. This would significantly reduce the cost of migrating to a digital exam format at a future time.

A review of the current Standard and Advanced syllabi reveals that the content and modes of operation are very close. The principle difference being only the depth of knowledge that is examined. In the past there were sufficient differences in content to make this form of consolidation difficult, but now that Standard licensees have access to digital modes, a consolidated model is now viable.

This approach has been discussed widely and there is general enthusiasm for the concept. The current change process underway for February 2024 presents an opportunity to introduce this proposal.

Some comments received by RASA indicated a desire to balance 'easy' vs 'more difficult' questions within any exam. This could be resolved by having a certain number of questions flagged as 'higher difficulty' questions, with candidates attempting a Standard license being required to answer a minimum number of these difficult questions as a part of their 60% pass.

The most important aspect within the adoption of this strategy is that the degree of difficulty for the candidate remains unchanged for both Standard and Advanced pass thresholds. This is achievable.

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**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?**

RASA is generally satisfied with the proposed fee structure as outlined in the **2023-2024 Cost Recovery Statement**.

We propose that the 2x1 Contesting Callsign structure should fall under the same regime as normal amateur callsigns, whereby no annual renewal process and associated fee would be necessary. As with normal callsigns, the ACMA can check every (approximately) 5 years to confirm that the amateur is still active. This would remove some legislative burden from the ACMA and simplify processes for amateurs.

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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?

RASA is satisfied with the proposed **qualification and accredited assessor framework**.

We note, under the heading in the August 29 Bulletin under the heading “Arrangements for Amateur Radio Clubs”, in discussing Club Callsigns,, we see this:

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

We question the inclusion of a requirement for the club’s delegated applicant for the club callsign to hold an Advanced-level qualification. This appears to be a new idea, and not necessary. Current and proposed rules are very clear about use and supervision of the callsign, and requiring an Advance level qualification for completing a form doesn't make sense. We assert that the most important part of applying for a club callsign is evidence that the application is authorised by the club.

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?

RASA is satisfied that the timetable for the new Assessors framework can be implemented in synchronisation with the transition to Class Licensing at the proposed date of February 2024.

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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?

#### **Additional Comment Item 1**

RASA opposes the proposed integration of Scientific Licenses within Amateur Radio band segments. (This is detailed in the following section on the ***Review of Scientific License Arrangements.***)

#### **Additional Comment Item 2**

RASA is concerned that some external territory callsigns (VK9, VK0) are being withheld or controlled by individuals or clubs for extended periods (years) without a corresponding presence or permit for these territories. This anomaly reinforces unfair monopolisation of important callsigns and is in breach of current guidelines.

RASA proposes that:

- (A) These inactive callsigns be reset and released to the callsign pool as per normal guidelines
- (B) Access to these callsigns should be conditional upon operators being able to demonstrate an intent and ability to occupy these locations within a nominated 12 month period.

This would be a more equitable approach for all legitimate residents and visitors to these territories.

### **Additional Comment Item 3**

In August 2020 The ACMA relaxed a policy on the allocation of callsigns whereby Amateurs were no longer required to change callsign when they relocated interstate. This was a departure from a century old convention which had been maintained for practical reasons. The connection between an operator, their callsign prefix and the state where they reside, allowed other stations to estimate the approximate geographic location of an active station. The removal of this requirement has created operational difficulties, as directional antennas are often rotated in the general direction of the target state when attempting to maximise signal. (For example, a Queensland operator upon hearing a faint VK3 callsign would immediately orient their directional antenna to the South.)

The state identifier VK1 through to VK8 also plays an important role in communication contesting where points are allocated on the basis of an accurate state identifier. Amateurs at many Australian clubs have raised this issue with RASA during contact visits, citing strong objections to the abandonment of the state identifier policy. Accordingly, RASA proposes that the requirement of a callsign change to reflect the state of operator residence be restored. A person relocating to a different state for more than 6 months should be required to change that callsign with one which correctly reflects their new state of residence.

### **Additional Comment Item 4**

RASA wishes to reiterate the need for inclusion of a 60 metre band segment in alignment with current international conventions. Details follow.

### **Proposed implementation of the 60 metre band for Australia**

#### **Background**

Since 2015 many countries have fallen into alignment with international convention providing Amateurs with basic access to the 5MHz or 60 Metre band. Specifically, the small allocation is between **5.3515 MHz** and **5.3665 MHz**.

In between the 80 and 40 metre allocations, 60 metres has unique ionospheric characteristics which makes it highly sought after. The allocation is not large, but it fulfils an important niche in the HF spectrum.

Closer to Australia, New Zealand currently has access to the 60 metre band for its Amateur Operators. Australia remains an international exception in that it is one of the few countries which continues to deny Amateur operator access to the 60 metre band.

#### **Previous submissions by RASA**

RASA has previously made written submissions to the ACMA seeking alignment with other countries on access to the 60 metre band. The response has been negative, brief and contained doubtful assertions:

- That this part of the spectrum must be reserved for 'Defence purposes', which may include the Over the Horizon Radar System.

RASA continues to submit that:

- The current position to deny access to 60 Metres is based upon flawed assumptions made by the Department of Defence and not as a result of logical assessment by the ACMA.
- Presently there are more than 2,200 Australian assignments between 5 and 6 MHz. The band is currently used extensively by land mobile networks.

- The busiest of these networks, by far, are the eight major networks catering to remote outback travellers in four-wheel drive vehicles.
- Between them, these networks operate on ten 5 MHz frequencies through twenty-five base stations, spread all over Australia – there are base stations and mobiles operating in every State and Territory.
- Collectively, these networks have thousands of members. They all operate regular daily scheduled broadcasts. The frequencies used are spread all over the 5 MHz land mobile band.
- The assumption that low power Amateur operations on 60 meters would have impact that exceeds the many existing higher power services already operating in the same spectrum space is absurd.
- By contrast, the proposed amateur allocation – operating in a 15 kHz sub band, on four fixed channels, would use 8 dB less transmit power. It has also been proposed that the band only be available to Advanced licensees, thereby restricting numbers significantly.
- The potential for interference to radar systems from such an allocation is negligible. Moreover, the restriction of the proposed amateur allocation to four channels in a narrow sub-band means that these can easily be notched out by a modern radar system if required and would have no effect upon its utility. This is the opinion of specialists who have had experience in the arena of Defence communications. The arguments presented thus far to deny access to this band segment have no technical basis.
- The present policy of access denial to 60M is contradictory. If it were valid that 5MHz operations did affect Australian defence systems, then they would already be compromised by existing fixed mobile services and by Amateurs presently using these frequencies in New Zealand and other Pacific nations. If use of this band segment was a true threat to ‘national security’, the ACMA would already have outlawed any new commercial allocations in this space. This has not happened.

The proposal to permit Advanced amateur operator access to allocations between **5.3515 MHz** and **5.3665 MHz**. is bipartisan, in that the proposal currently has the support of both RASA and the WIA.

We propose that the release of a 60 Metre band allocation for low power operations be approved as a part of the transition to Class Licensing in 2024.

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## RASA RESPONSE TO ACMA CONSULTATION PAPER , September 24, 2023

ACMA Consultation Title:

*Review of scientific licensing arrangements Consultation paper August 2023*

The ACMA supplied the following template for stakeholders to provide comment upon their proposals, to be uploaded before September 26, 2023. The RASA response is a compilation of consultations from the RASA board, Feedback from some radio clubs (able to respond within the short time frame) and individual comments supplied by RASA members.

### **Issues for comment**

**We invite comments on the issues set out in this paper:**

1. Are the existing conditions in the Scientific LCD for the operation of land stations and mobile stations appropriate? Are there any updates we should consider if we replicate these conditions in a class licence?
2. Are the existing conditions in the Scientific LCD for ultra-wideband technology appropriate? Are there any updates we should consider if we replicate these conditions in a class licence?
3. The proposed class licence makes some minor changes to the provisions of the Scientific LCD, such as expressly providing for additional activities (repair and maintenance), and providing that people may operate devices in shielded enclosures as well as screened rooms. Are there any other updates we should consider?
4. Is the proposed class licence fit-for-purpose for the types of activities we are contemplating authorising? We welcome any comments on the form of the proposed class licence.
5. Should we amend relevant frequency band plans to allow for operation of scientific stations authorised by the proposed class licence?
6. Are there any other domestic or international arrangements for experimentation or trials (radiocommunications or otherwise) that we should examine?
7. The ACMA recently reduced taxes by 50–90% for assigned licences above 5 GHz as part of our implementation of the Spectrum Pricing Review, which we consider makes scientific assigned licences more accessible, especially for services with large bandwidths. Is there still interest in the concept of a short-term trial licence, issued on a non-renewable, minimum tax basis? If so, what types of trials could it facilitate? We are specifically interested in technology types, and technical parameters (for example, frequency ranges, power levels).

**In response to Q1** we submit that The use of Scientific licenses are inappropriate within Amateur Radio spectrum allocations (ref Q4 response for details)

**In response to Q2** we submit that The use of Scientific licenses are inappropriate within Amateur Radio spectrum allocations (ref Q4 response for details)

**In response to Q3** we submit that The use of Scientific licenses are inappropriate within Amateur Radio spectrum allocations (ref Q4 response for details)

**In response to Q4, it is the position of RASA, club groups approached thus far and many individual operators, that it is wholly inappropriate to apply Scientific Licensing to Amateur Radio spectrum use and operator activities in any form.**

Questions for comment **1 -3** and **5- 7** are all predicated on the assumption that Scientific licenses can be appropriately applied to Amateur Radio activities and frequencies. In Australia and other countries, Scientific Licenses are reserved for Commercial, Industrial or military activities. Such work is inconsistent with the objectives of Amateur Radio.

RASA has lobbied the ACMA for several years now on a plan to enable Advanced Amateur Operators to utilise transmission levels up to 1kW PEP. We believe that the existing framework of knowledge and precaution governing Advanced Amateur licenses is sufficient to manage higher power levels.

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

Additionally, RASA prepared and submitted a detailed technical paper highlighting the minimal impact to human health where 1kWw power transmissions are used.

(This document remains accessible on the RASA website Here:

<https://vkradioamateurs.org/regulatory-issues/%ef%bb%bf1-kw-for-advanced-licences/> )

It is possible that the ACMA has not considered the effective duty cycle of transmitter equipment when used by Amateur operators. Most commercial applications administered by the ACMA are AM/FM broadcasts and digital transmissions that approach a 100% duty cycle. Such transmissions should be treated with due caution. Duty Cycle measurements as cited in the health document show that an Amateur transmission via a 1 kW rated P.A. stage will average only 25 to 45% on SSB or CW, over a sample 6-second transmission time. This duty cycle is further diminished in practical terms whereby operators generally switch to receive mode for the same or longer interval before their next transmission.

Average delivery and exposure to RF by Amateur Operators is typically much lower than the continuous levels presently contemplated by the ACMA.

For several decades literally hundreds of new and second hand 1kW+ power amplifiers of various transmission modes have been imported from around the world and traded within Australia. It may be that the ACMA is currently unaware of the extent of this practice. That there have been very few issues arising from existing high power use reinforces the benign nature of this activity.

The proposal document contains the following paragraph:

*Most applications for assigned scientific licences are prepared with the assistance of an accredited person who undertakes coordination and frequency assignment tasks. The licence application is then considered by the ACMA.*

This process is entirely inconsistent with Amateur Radio accreditation. 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 to 1.5 kW) specified by their regulators.

**Fundamentally Amateur Radio is not a commercial Activity and Scientific Licenses are inappropriate. Amateurs who have already passed the Advanced exam threshold should not have to seek separate approvals from Accredited bodies and purchase additional temporary licenses to conduct their normal communications and non-commercial experimental activity.**

**In response to Q5** we submit that The use of Scientific licenses are inappropriate within Amateur Radio spectrum allocations (ref Q4 response for details)

**In response to Q6** we submit that The use of Scientific licenses are inappropriate within Amateur Radio spectrum allocations (ref Q4 response for details)

**In response to Q7** we submit that The use of Scientific licenses are inappropriate within Amateur Radio spectrum allocations (ref Q4 response for details)

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