

A review of the proposed changes to amateur license arrangements

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Tonight we will...

- ▶ Introduce the revised ACMA Class Licence proposal
- ▶ Touch on the main points of the consultation
- ▶ Discuss options for “having your say”
- ▶ Q & A

Recap

- ▶ The ACMA initiated a review of the amateur licencing arrangements in April 2021
- ▶ The purpose of the review was to “ *...reduce regulatory burden and minimise costs for licenses...* ”
- ▶ Most response (some 800) to the review indicated “ *... conditional preparedness to support a future class licence...* ”
- ▶ The observations that follow are my views alone...

The general idea is to:

- ▶ To simplify the amateur licence conditions
- ▶ Remove obsolete, duplicated or redundant text from the licence conditions
- ▶ Provide a licence for life at zero or minimal cost
- ▶ However the changes don't apply to repeater or beacon licenses which are still assigned and which will continue to require payment and be subject to other licence conditions
- ▶ All good, but the “devil is in the detail”

Developments to date

- ▶ A new consultation phase (31/2022): “*Proposed amateur class licence and considerations for higher power operation*”
- ▶ Note the two parts of the consultation:
 - ▶ The draft class licence (DCL)
 - ▶ Operation at higher power
- ▶ The consultation response is based around fifteen separate questions and the ACMA documents need to be read very carefully

Outcomes – probably good

- ▶ The ACMA has responded positively to a variety of issues that were raised in the initial consultation:
 - ▶ additional band access for standard licence holders (See Q1)
 - ▶ removal of some geographic and bandwidth restriction on some bands
- ▶ DCL does not contain various clauses which were viewed as operational matters rather than spectrum management issues :
 - ▶ e.g. portable stations, connection to telecommunication networks, assigned club station licences etc.
- ▶ So assume anything not prohibited is allowed?

Outcomes – not so good

- ▶ There is now explicit regulatory text covering Electromagnetic Exposure (EME), see Schedule 1 of the DCL
- ▶ The EME compliance is likely to be more complicated and possibly expensive; likely to impact all amateur operators in some way
- ▶ Loss of the existing ACMA licence register; the ACMA proposes this resource should be provided by the community of amateur operators
- ▶ New text covering issuing call signs by a third party

EME compliance - 1

- ▶ We already were required to comply EME obligations through the “Radiocommunications Licence Conditions (Apparatus Licence) Determination 2015 “ but no explicit mention in amateur apparatus licence
- ▶ DCL now explicitly includes EMR as Schedule 1
- ▶ Divides stations into two levels: *low risk vs. higher risk* based on nominal criteria
- ▶ *What is strange is that the conditions given in DCL 2 (2a) only cover bands from 10 MHz up; what about the five bands below 10 MHz?*

EME compliance - 2

- ▶ DCL directly refers to ARPANSA standard: *Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz* this standard is **free**
- ▶ DCL also refers to other standards which cost a **lot** of money
- ▶ Third party EME compliance assessment could be expensive if it is required
- ▶ **No questions to respond** in the consultation document!

EME compliance – low risk stations

- ▶ Low risk station (includes mobile stations up to 100 W):
 - ▶ (a) for which:
 - ▶ (i) the average total power supplied by the station to all antennas fed by the station is not more than 100 watts; and
 - ▶ (ii) each antenna fed by the station is installed so that it is inaccessible to a member of the general public; or
 - ▶ (b) for which:
 - ▶ (i) the base of the lowest antenna fed by the station is at least 10 metres above ground level; and
 - ▶ (ii) the average total EIRP of all antennas fed by the station is not more than 3200 watts in any direction.
- ▶ Requires a RF exposure compliance assessment by operator and record keeping
- ▶ Probably OK and not too difficult using web based calculators, VK3UM, RSGB etc.,

EME compliance – high risk stations

- ▶ Much more complicated:
- ▶ (2) Subject to subclauses (4), (6), (7) and (8), a person must not operate an amateur station unless the person has measured or calculated the radiofrequency fields produced by the station in accordance with one or more of the following:
 - ▶ (a) if AS/NZS 2772.2 applies in relation to the station – AS/NZS 2772.2;
 - ▶ (b) if C95.3 applies in relation to the station – C95.3;
 - ▶ (c) if IEC 62232 applies in relation to the station – IEC 62232;
 - ▶ (d) if IEC 62577 applies in relation to the station – IEC 62577.
- ▶ Worse:
- ▶ (2) Without limiting subclause (1), an amateur station is *changed* if:
 - ▶ (a) the station is moved to a different location; or
 - ▶ (b) the amount of power fed to the station's antennas is altered; or
 - ▶ (c) a characteristic of any of the station's antennas is altered, including an antenna's:
 - ▶ (i) gain;
 - ▶ (ii) size;
 - ▶ (iii) height above ground or another accessible surface;
 - ▶ (iv) tilt; or
 - ▶ (d) the station's emission mode is altered.

EME compliance – high risk stations

- ▶ Aside from probably incurring significant cost, the issue fixing the station to a particular configuration goes against any sort of experimentation or station upgrades
- ▶ It may be difficult for level 2 stations to meet the exposure limits in a typical suburban environment. What then?
- ▶ Even though there are no questions on this topic **any points of concern should be raised in your response** to the ACMA

High power operation - 1

- ▶ Immediate application: E-M-E stations wanting to operate at powers higher than that specified in the class licence will need to seek case-by-case approval and obtain a scientific license.
- ▶ Current cost of S.L = \$606 and still has to comply with exposure limits, 12 month renewal etc.
- ▶ Interservice communications? Unclear regulatory position?? Is amateur to scientific station a valid QSO?
- ▶ See Q 8 & Q 9

High power operation - 2

- ▶ Medium term: availability of high power operation for general amateur usage, but probably only for specific bands and other undefined conditions.
- ▶ Submit **your** comments to the ACMA if you are concerned about this.
- ▶ See Q10 through Q 15

Call sign administration

- ▶ Quite a few proposed changes and probably more complicated arrangements than at present
- ▶ Possible restrictions on the number of call signs a person can hold (is this an issue?)
- ▶ A proposal to introduce a “*regular check*” by the “Call sign entity” (AMC) that the call sign is still in use. **NO** details provided about how this will be implemented
- ▶ Make your responses to Q 2 through Q 5

Loss of ACMA licence register

- ▶ The change from apparatus licence to class licence will mean the removal of amateur licences from the publicly accessible ACMA licence register (RRL)
- ▶ The ACMA proposes that the amateur community use “...*amateur operated or other existing voluntary registers* ...” instead (QRZ.com? etc.)
- ▶ How important is the RRL to **you**? Will other arrangements be OK?
- ▶ See Q 6 and respond appropriately

Other matters

- ▶ Reciprocal licensing of foreign operators, time allowed increased to 365 days. Any longer requires obtaining an AOCP. No specific question to answer on this topic
- ▶ Operation in CEPT countries by Australian amateurs. Some concern here about recognition of AOCP's by CEPT administrations. See Q 7
- ▶ Amateur operating procedures – ACMA completely “hands off”, no apparent interest or questions

Summary

- ▶ The proposed amateur class licence has good and bad parts:
 - ▶ Significant reduction in “ *...regulatory burden...* “ which may be beneficial
 - ▶ More complex arrangements for EME compliance, call sign administration and high power operation
 - ▶ Other changes , including loss of RRL, which may affect you depending upon circumstances
- ▶ The proposed changes will have **profound impact** on the future of the amateur services in Australia

The WIA response

- ▶ The WIA has established a working group which is working on a formal WIA response
- ▶ The group has met three times to date and is making good progress on addressing the issues identified
- ▶ A national poll is planned prior to the submission closing date to collect views of Australian amateur operators on the ACMA proposal
- ▶ Make **your** views known when the poll is announced

Or make your own submission!

- ▶ Directly to the ACMA per the consultation document
- ▶ Note the comments in the section “Guidance to providing feedback”
- ▶ Think about the issues and have **your** say! However you decide to do it
- ▶ Note: **Submissions close 29 November 2022**

Thanks for listening

- ▶ Questions?

- ▶ Contact: dalevk1dsh@gmail.com