

Greetings

The members of the Adelaide Hills Amateur Radio Society in Adelaide South Australia fully endorse the comments made by Leigh Turner VK5KLT regarding the future of Amateur Radio.

We are most concerned of any reduction of the level of knowledge, construction, and operating skills covering a whole range of modes, be it voice, digital, or even Morse.

The practical applications of these skills and knowledge are always available from all licenced Amateurs to the wider community whatever be the need .

The ability to mentor, teach, and pass on these attributes to all, including our next generation, is paramount to our being.

We wish to be able to continue to serve this objective to provide a base of Radio Communication operators, and help provide a career path for students, without any reduction of skill or “Dumbing down” of knowledge.

Amateur Radio creates world-wide friendship and understanding.

Thank You, Phil Storr, President of AHARS, our committee and our in excess of 150 members. <http://www.ahars.com.au/>, vk5srp@wia.org.au

The Manager

Spectrum Licensing Policy Section

Australian Communications and Media Authority

POBOX 78

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Dear Madam/Sir,

As an interested stakeholder I wish to make the following selective comments and input representations about the June 2019 consultation paper outlining proposed variations to the amateur licence conditions / LCD. Any of the ACMA change proposals in the consultation paper not commented on infers the existence of an impartial neutral stance without my concern either way. It is overwhelmingly crucial that any proposed changes to the existing licence framework aimed at reducing the ACMA regulatory burden do not have any far-reaching unintended consequences that are deleterious to amateur radio going forward in Australia.

There should be no “dumbing down” de-skilling or consolidation of the existing three-tier hierarchical licence system of entry-level Foundation, Standard, and Advanced licences. This graduated structure serves the 15,000 or so Australian amateur radio licence holders very well catering for the widely disparate levels of knowledge and skill in what is fundamentally a technical hobby and technical/scientific experimentation based pursuit. The extant licence tier

system should be retained and not unduly weakened. Many of today's eminent Australian engineers, scientists, and inventors have come up through their ranks as a result of a deep lifelong interest in experimental inquiry and practical oriented amateur radio pursuits complementing their professional endeavours. Australia's future and economic success in the rapidly accelerating technological age demands a large increase in STEM based professional skills and there exists a strong nexus between budding technologists attaining this important objective and the pivotal engendering role that amateur radio plays in creating this pool of talented wealth creating individuals.

Commensurately and hand in hand with the retention of the amateur radio community's well supported hierarchical system is the judicious allocation of licence holder privileges. In this regard it makes complete sense to update the LCD to allow Foundation licence holders to engage more fully by using digital modes and internet connected repeater use as this technology modernisation measure bridging the digital data and wireless domains will beneficially facilitate greater interest and increased numbers entering the hobby. Likewise Foundation licensees should be able to construct and use their own transmitter or transceiver equipment if based on commercially available (and generally well-designed) kits. The consequential reduced differentiation between licence tiers is deemed an acceptable trade-off to attain these greater participation numbers and growth in amateur radio communications and all of the diverse allied technical endeavours and skill sets it embraces.

However, the permitted frequency bands and the power limit for Foundation licence holders should be retained at its present 10W PEP power level. Relaxing these two key remaining limitations cannibalises the extant tier structure and removes any incentive to upgrade licence holder knowledge and skill, effectively encouraging complacent stagnation at the entry licence level rather than being a steppingstone to further learning and earning greater privileges. This dumbing down scenario will have deleterious long-term negative operational and public perceived reputational consequences for the highly technical hobby. The general public understands that an Amateur Radio license is a highly respected attainment that is unlike a perfunctory fishing / hunting license or perhaps a software license; it signifies learning and understanding of a significant body of knowledge and is a technical qualification that has been acquired by an individual through study and passing theory, regulations, and practical examinations.

The Standard licence privileges should be left as they are, unchanged. The notion of allowing all three licence levels to use 400 Watts PEP is wholly inconsistent with the retention of a hierarchical structure.

On the subject of authorised power limits, and consistent with the need for increasing the above diminished licence differentiation due to significantly expanded Foundation licence privileges, and alignment with other regulatory jurisdictions, the permitted power level for Advanced licence holders should be increased to at least 1 kW, and preferably 1500 Watts PEP. It remains perplexing and unfathomable why ACMA remains recalcitrant and unbending on this issue. Such a rigid posture begs the inevitable question of what the ACMA purport to know about safe human EMR exposure limits to non-ionising RF fields that its global counterparts, in consultation with relevant EMR/EME experts, IEEE Standards, and FCC Guidelines do not know; and why there is a lack of consensus and consistency across amateur radio regulatory jurisdictions on what EME exposure level is deemed safe. The question must be asked why is Australia so different and out of kilter with these other radio spectrum regulators (such as the FCC and our regional NZ neighbour) who support these higher power limits for Advanced licence holders?

An excellent subject matter overview paper written by Dr Andrew Smith VK6AS titled "*Review of Radio Frequency Electromagnetic Energy Hazards for Amateur Radio*" (see attached pdf) addresses the EME subject in an erudite no-nonsense and factual manner. I concur with its contents and conclusions and believe this paper should be a key reference document for the ACMA to consider in bringing timely closure to this protracted matter. An increase of permitted PEP from 400W to 1kW or 1.5 kW would not have any deleterious effect on radio amateurs, members of the public, or animals, as long as the amateur station HF and VHF/UHF emissions are in easily attainable (and readily verifiable) compliance with prevailing ARPANSA standards.

I hope these inputs are helpful contributions towards your policy formulation.

Yours sincerely, Leigh Turner, VK5KLT
Former WIA Examinations Assessor 5-022

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