

5th September 2023

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne VIC 8010

Robert Campiciano
308 Morebringer Lane
Balldale, NSW, 2646

Thank you for the opportunity to comment on the proposed amateur radio qualification and assessor accreditation arrangements.

First I take the opportunity to state that the manner this consultation is presented has confused many in the amateur radio community. Too many documents to cross reference, if the ACMA intent was to reduce the participants in this consultation I think the objective has been achieved
I will try to provide feedback based on my understanding on the material presented, not having located Attachments A,B,C referred in the questions.

The posed questions and answers -

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

The proposed framework is acceptable since it's really no different to what exists presently.

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

An online system is imperative and the ACMA should engage presently with urgency in the establishment of such a system.

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?

If I could locate attachment B I would be in a better position to answer, however having read the parts pertinent to assessor qualifications my answer is that I have no comments in the presented manner of accreditation, with the exception of the requirements under RPL, the definitions of what is acceptable is too narrow and excludes many other qualifications that not necessarily include the operation of a radio transmitter, but provide a very sound knowledge of electronics.

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

As I am unable to locate Attachment C, however I make the following observation, in the stated guidelines my concern is that the assessor should be allowed to recover out of pocket expenses and any associated costs in conducting an examination.

Under the previous systems involving the WIA then the AMC such cost recovery was allowed, I see no reason that an assessor should not be allowed to do so.

The ACMA could establish a nominal amount that assessor can charge for its expenses.

5/ 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

In the consultation the class licence instrument is often mentioned, however the ACMA has not yet published a final draft leaving open question that had been debated prior to the AMC debacle, questions such regarding handling of interference, power limits and or increases etc. have been lost in the AMC confusion

6/ 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?

Largely the RPL mechanism as stated is acceptable, however it does not recognise other qualifications that far exceed that of the AOCIP such as diploma in electronics, military obtained qualification etc. That don't necessarily include specific RF operations but cover the principles in more depth than the current amateur radio syllabus.

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

The change of the name of an instrument whose purpose is the same is a bit of nonsense the wording "Amateur Radio Certificate of Proficiency" states exactly the purpose so to change it to another with the same purpose will only confuse. I think we have enough confusion as it is.

8/ 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?

I find this question perplexing, in view of the manner that the consultation has been presented. I would have thought a final draft to the class licence first before anything else.

9/ 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?

If the ACMA sticks to the proposed charges it will be a positive step in reducing licencing and operational costs to the amateur operator, this will be good for the service longevity. However In the consultation, the active licence period is not defined, or how the renewal process is to take place and associated fee increases in the future.

10/ 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?

In the proposed framework my only comment is that out of pocket expenses should be allowed or the burden will be placed upon the associated clubs, The ACMA could allow a nominal amount so defined that the assessor can charge to compensate for out of pocket expenses, if it was good enough for the AMC and the WIA to operate on a cost recovery basis I see no reason for not allowing this kind of charge to be applied by the assessors.

11/ 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?

The question is not specific thus not able to provide any kind of answer.

12/ 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?

a/ The manner of introduction to a class licence, the ACMA has behaved unconscionably, ignoring the vast amount of opposition to the changes, the manner of obtaining a so called consensus by engaging a third party that represents a small fraction of the amateur radio community to conduct a survey that was flawed and dishonest whose results excluded many that wanted to vote against the changes, we should not be answering this consultation has the ACMA dishonestly has pushed for this outcome.

b/ We should be evaluating and commenting on the actual proposed licence conditions along with the promises made by the ACMA before any assessor questions.

c/ Is this consultation of the ACMA, a method so designed to reduce the amount of commentary, if this was the intention it has succeeded.

d/ The second part of this question, the mention is made of new qualification framework when all that is discussed is the method and rules for an assessor, but omitting any changes to the existing framework when the ACMA claims that it will alter the current syllabus, we should be asked this question after all changes have been made and published.

Secondly there is nothing wrong with the current framework aside the technical content that has deteriorated over the years.

Thank you for the opportunity to comment.
Robert Campiciano