

6 April 2021



Pete Wardle
Executive Manager
Spectrum Allocations Branch
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Dear Peter

RE: Accredited persons scheme consultation

The Communications Alliance Satellite Services Working Group (SSWG) welcomes the opportunity to comment on the ACMA's *Accredited persons scheme* consultation.

Removal of the requirement for AP applicants to sign a Deed of Indemnity

The SSWG supports the removal of the requirement for Accredited Person (AP) applicants to sign a Deed of Indemnity. Removal of this requirement may encourage others to become APs.

Introduction of a 'Specific Licensing Accreditation'

The SSWG members' experiences with applying for Earth Station or Space licences suggests that these types of licences are quite complex in both regulatory and technical dimensions. Some APs based on their experience specialise in related licence type such as Aeronautical and Aircraft types, Broadcasting and Datacasting types, Defence and Defence receive types, Earth, Earth receive, Space and Space receive types etc. The SSWG supports the creation of this type of Accreditation and to broaden its scope to related licence types rather than a single licence type. These specific licence types could be included with the list of APs on the ACMA website, and 'general licensing' be applied to the rest of the APs.

Noting that some licence types are quite complex in both regulatory and technical terms, the SSWG is potentially concerned about scenarios where coordination with other technology type(s) is beyond the speciality and experience that the specific licensing accreditation authorises the AP to practice in. The example the ACMA gives in the consultation paper, is a Specific Licensing Accreditation for amateur licences (beacon and repeater). The SSWG members' potential concern is that an AP with an accreditation for a narrow field such as amateur devices may not have the technical knowledge and experience to coordinate with other technology types. However, this risk could be ameliorated by a requirement for specialist APs to contact the licensee of frequency or geographically adjacent services to have that licensee's AP confirm the coordination has been done correctly. This would minimise the risk of interference accidentally being introduced by a specialist AP unfamiliar with alternate technologies.

Accreditation of companies

The SSWG supports the continuation of accreditation being tied to the individual APs rather than a company due to potential skill capability changes when APs move companies.

Other comments relating to SSWG members' experience with using APs

The SSWG notes that a couple of years ago, the ACMA adopted the approach that the pathway for applying for any radio licence was to use an AP. In early 2020, one SSWG member approached all the APs then listed on the ACMA's website to determine their capabilities concerning processing applications for Earth Station or Space licences. Only five APs advised that they could process that type of applications but two indicated that they would only handle 'simple Earth' licences. Another indicated a potential conflict of interest with existing clients.

In this situation, the environment for using APs for Earth Station or Space licences is not very conducive to competition and so high levels of charges in some cases apply. The SSWG believes that given the regulatory and technical complexity of some Earth Station or Space licences, direct application for these licences to the ACMA should be available.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,



John Stanton
Chief Executive Officer

About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:

<http://www.commsalliance.com.au/>