



AMSA Ref: 026662

Your Ref:

Mr Richard Clarke  
First Assistant Commissioner  
Productivity Commission  
Locked Bag 2  
Collins Street East Melbourne VIC 8003

Dear Mr Clarke

**Submission to the Review of Radiocommunications Acts and of the Market Based Reforms and Activities Undertaken by the Australian Communications Authority**

The Australian Maritime Safety Authority (AMSA) in its capacity as both a regulatory and search and rescue body is a major user of spectrum both in the aeronautical and maritime environment.

**Introduction**

AMSA is a significant user of spectrum and of the services of the Australian Communications Authority (ACA). It also has a strong interest in spectrum management issues from the perspective of the maritime and the fishing industries and the pleasure craft sector.

In relation to its direct use of spectrum, AMSA has licences for the operation of transmitters in connection with:

- a Differential Global Positioning Service used for vessel navigation;
- radars used in connection with the Ship Reporting System in the Great Barrier Reef;
- racon radio navigation system using maritime radar 3 and 9 GHz.
- links for the inter-connection of satellite ground stations; and
- a Coast Radio Station.

In addition to the above, contractors to AMSA make extensive use of spectrum for the operation of a network of Coast Radio Stations, for Inmarsat satellite-based

communication facilities and for the Cospas-Sarsat satellite-based distress beacon system.

In relation to the services offered by the ACA, AMSA makes extensive use of the services for the resolving of interference, in particular, for the tracking of transmissions from satellite-based emergency beacons. It frequently arises that transmissions from a distress beacon, or on the distress beacon frequency, are detected by the Cospas-Sarsat system although the source of the transmissions cannot be detected. In these circumstances, AMSA will call on ACA staff to locate the source of the transmissions.

Finally, AMSA makes use of the ACA's database of licences as an information source for the purposes of our search and rescue activities.

Against the background of the above, AMSA offers the following views on the radiocommunications legislation and of the service provided by the ACA.

### **Legislative Issues**

AMSA has no difficulties in principle with the provisions of the Radiocommunications Act 1992. In general, AMSA is of the view that the legislation provides a sound basis for the planning, allocation and management of spectrum. Nevertheless AMSA believes that there is a degree of nervousness amongst non-commercial spectrum users, both in Australia and internationally, that market-based reforms to spectrum management, such as the auctioning of spectrum, could have serious implications for emergency and safety of life services. We note, however, that no auctions in Australia have yet impacted on our services.

### **Background**

The VHF band between 156-174 MHz needs to be preserved for maritime usage, with the existing band plan as laid down in the ITU Radio Regulations Appendix S18. With the reduction in commercial traffic in this band there is still a need to preserve this spectrum for other maritime services, particularly vessel tracking and ship management services.

### **Licensing Arrangements**

As of 1 July 2001, under new arrangements introduced by the ACA, new VHF installations no longer require a ship station licence and are now covered by a class licence. Up to July 2001 call signs were issued to a radio operator as part of the ACA's licensing process. An implication of the new licensing arrangement is that there is no longer a central body in a position to issue call signs to operators. As a consequence where a vessel has a VHF installation as the only communications system on board, there will be no record of the vessel on a recognised database. This presents major problems for the search and rescue centres. Without a registered call sign there is no way of identifying the owner or locating a description of the vessel or other relevant details to assist in the search and rescue operation.

There is still a requirement to hold a Marine Radio Operator's VHF certificate of proficiency (MROVCP) in order to operate such equipment. However, without a radio call sign, identification may prove difficult in the event of infringements to the Radio Regulations. The fear within the maritime industry and search and rescue community is that this band will become degraded to a similar degree as the UHF (27MHz) band.

AMSA acknowledges that maintenance of a register of call signs is not necessarily a spectrum management issue. Notwithstanding, the ACA's database of licences had provided an extremely convenient means of maintaining data and the maritime community is now assessing the implications of the licensing change.

### **Interference Management**

Infringements of the Radio Regulations must be given a high priority particularly when the interference is on recognised safety channels.

Interference in the HF bands between 4000 and 27500 kHz, particularly on the maritime safety frequencies, has been on the increase over the past twelve months. Despite the number of interference complaints being submitted, it is still a growing issue and a source of concern to the efficient management of safety radio communications. AMSA is concerned that increasing levels of interference will impair maritime safety communications and will represent a risk to the safety of life at sea.

Interference in the HF bands between 3025 and 18030 KHz which is used exclusively for the aeronautical mobile service, also suffers from similar levels of unacceptable interference.

In relation to the services provided by the ACA in locating satellite-based distress beacons, AMSA is of the view that the ACA provides a high level of service that ACA staff are generally available to be called out outside normal office hours and frequently in difficult circumstances. While AMSA is pleased by the services offered by the ACA, it has been evident that the rationalisation of staffing numbers has increasingly meant that ACA staff are unavailable for call out duties in particular locations. This is a matter of some concern to AMSA.

AMSA also notes that, in recent years, the ACA has commenced charging for services (such as location of distress beacons) which were previously provided free of charge. While AMSA accepts with reluctance the imposition of fees by the ACA, AMSA does consider that the level of the fees is excessive.

### **International Planning Arrangements**

AMSA has been a participant in Australian delegations to the ITU's World Radio Conference and has also participated in the development of Australian positions in preparation for such conferences. AMSA believes it is given ample opportunity to provide contributions to the international planning processes.

Yours sincerely,

Rowena Barrell  
General Manager  
Australian Search and Rescue

10 October 2001