



Productivity Commission  
Review of the Radiocommunications Acts and  
the Role of the ACA

**Submission by Country Fire Authority  
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## 1 Introduction

The Country Fire Authority (hereafter referred to as CFA) is Victoria's largest rural fire fighting agency, staffed principally by volunteers (99%).

The ACA has granted licences for a range of radio services used by CFA on a "fee exempt" basis, in line with the specific provisions of the *Radiocommunications Taxes Collection Regulations* and the *Radiocommunications (Charges) Determination 2000*. Specific reference is made in these instruments to bodies which provide emergency services or services for the safeguarding of human life, including rural fire fighting.

Activities in which CFA is involved and which use radiocommunications include:

- Fire ground communications
- Communications at other incident types, including road accident rescue and hazardous waste accidents
- Permit burn off operations
- Training
- Listening watch by volunteer fire fighters
- Monitoring of radio traffic
- Aerial fire spotting and co-ordinating aerial fire bombing aircraft
- Co-ordinating and dispatching fire fighting appliances and resources
- Fire spotting towers
- Weather data acquisition and dissemination
- Broadcast of fire weather warnings

## 2 Fee exemption

Funds for the operations of CFA are obtained predominantly through a levy against insurance premiums (77.5% of funding) and from the Victorian State Government (22.5%).

The generation of funding is therefore not under the direct control of CFA, the level of funds strictly limited and these resources stretched thin for CFA to carry out the community safety work expected of the organisation. Any move towards imposing fees on CFA, based on consideration of a market-based competitive model, would have serious budget implications for CFA and would be likely to result in a reduction in the community safety work of CFA.

Similarly, CFA is not in a position to compete on a commercial basis for use of the spectrum. Indeed, it could be argued this may result in inappropriate pressures in relation to provision of resources required for safety of life situations.

## 3 Licence tenure

Due to funding limitations and the need for stability of radio equipment types used by volunteers with minimum training, the radiocommunications systems operated by CFA have generally been required to operate for many years.

Consequently, the long term tenure of issued licences is appropriate and highly desirable in almost all instances.

Whilst it is understood that the majority of licensees opt for licence periods of one year duration (and CFA has been no exception), it would be more appropriate for CFA for future licence renewals to be for the maximum period allowable, viz. five years. This will result in cost economies for:

- i) CFA in the preparation of renewal applications and
- ii) ACA in the processing and reissuing the licences.

It is the intention of the CFA to apply for five year licences in the future, the first opportunity being the annual renewal of the majority of CFA licences in March 2002.

Where CFA has a short term requirement for frequency allocations, applications would continue to be made for licences with a one year term.

#### 4 Adequacy of spectrum allocations

The allocations made by the ACA in response to CFA licence applications have generally satisfied the needs of CFA in the past.

However, there are significant deficiencies in the coverage of CFA VHF Land Mobile services which require some additional channels to be licenced in various parts of the state. CFA is currently analysing the reuse of frequencies (currently licenced to CFA) to minimise the number of additional frequencies requiring licences for community fire safety in rural areas.

#### Summary

- i) Radiocommunications is used extensively by CFA as an aid to save lives during fire fighting and to enhance community safety throughout Victoria.
- ii) Licences for CFA radiocommunications services are “fee exempt” and it is vital from a financial perspective for CFA that this remain so. CFA does not believe the organisation should be considered as part of a commercial or competitive-based model in terms of spectrum charges.
- iii) CFA intends to move towards a 5 year licence tenure period.
- iv) The ACA has generally worked well with CFA in providing licences for CFA radiocommunications services and has been responsive to the spectrum needs of CFA as it continues to provide essential services to the Victorian community.

**End of Submission**