

DB TELECOMMUNICATIONS PTY. LTD.
ACN 069 768 529

*TELECOMMUNICATIONS &
IT CONSULTING SERVICES
P O Box 216, Essendon, Vic 3040
30 Elder Parade, Essendon, Vic 3040
Telephone (03) 9331 3170
Fax (03) 9331 3153*

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Spectrum Reform
Department of the Communications and the Arts
GPO Box 2154
CANBERRA ACT 2601

DISCUSSION PAPER ON TRANSITION TO THE NEW RADIOCOMMUNICATIONS BILL

DB Telecommunications Pty Ltd is pleased to be able to offer comment on the various measures associated with the transition to the new Radiocommunications Bill.

David Britt of DB Telecommunications Pty Ltd has been providing ACMA Accredited Frequency Assignment services to a range of commercial and government clients since 1998.

Due to time limitations, the comments in this submission are limited to section 12 of the draft bill.

DB Telecommunications Pty Ltd is also a member of the Australian Radio Communication Industry Association (ARCIA) and is broadly supportive of the more detailed submission provided by ARCIA.

Part 12 – Accreditation

DB Telecommunications notes that the Accreditation provisions contained in Part 12 of the draft bill largely mirror the provisions of the existing scheme, but provide the ACMA with the ability to vary the scheme to meet changing needs in the future.

As noted in the ACMA's supporting paper, Accredited Persons (APs) now assign about 90% of all apparatus licence applications. In order to ensure that there is no discontinuity of this valuable service in the transition to the new bill, at the very least the provisions of the existing accreditation scheme should be grandfathered across to the new bill, unless the new accreditation rules were ready at the time of commencement of the new bill.

In its supporting paper, the ACMA has indicated that will look at the accreditation of companies as opposed to just individuals under the current scheme, DB Telecommunications does not see the accreditation of companies as offering huge advantages, as the accreditation of those companies would have to be contingent on them employing individuals who were accredited, or at the very least were capable of meeting the requirements for individual accreditation.

Some of the larger firms employing multiple APs have been operating successfully under the current model for over 20 years, suggesting that there is not a major need for change.

As noted in the ACMA paper, if companies were accredited it would be critical to review and assess the internal procedures of those companies to ensure that assignment work by unqualified personal did not slip through under the accreditation certification of the overall company.

Where it may be an advantage to be accredited as a company is that instead of having all of their accredited persons appearing on the list of accredited persons, a company could have a single listing which may simplify that company's dealings with the communications industry and the general public.

The ACMA has flagged the possible expansion of the accreditation scheme to cover other areas of spectrum management. Although it is just a discussion point at this time, it is a concept that DB Telecommunications would support. Any expansion of the accreditation arrangements would obviously have to be appropriate rules and certifications requirements.

One of the areas that DB Telecommunications believes that APs could play an expanded role would be in the management of licence renewals. The current system has flaws with licensees often believing that they did not receive licence renewals from the ACMA. The incidence of this appears to be increasing, presumably due to licensee details not being kept up to date.

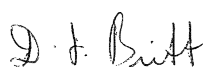
During the past 12 months there have been periods when up to 30% of DB Telecommunications' assignment work has been associated the issue of new licences to licensees whose licences had been allowed to lapse. While this is good from a revenue perspective, it is unproductive for the economy as a whole.

To look at an example from another industry, in many states the management of workers compensation policies are outsourced to various insurance companies and other entities on behalf of the government. Companies are able to select which organization they wish to use to administer their policy.

Under a similar model, if licensees had the option to nominate a particular AP or accredited company to manage their licence renewals, that potentially more direct relationship between AP and licensee may make the process more efficient and help to reduce the incidence of lapsed licences.

DB Telecommunications apologises for the brevity of this submission due to work volumes and other constraints. If you would like additional information or wish to discuss any aspect of our submission, please do not hesitate to contact me on (03) 9331 3170 or by email dbritt@dbtelecomm.com.au.

Yours sincerely,



David Britt
Director