

Submission... Radio Spectrum Management Fees Review

Thank you for the opportunity to make a submission to the fees review.

As I carry out Radio Engineering work in an external and single capacity, I am really only interested in the Engineering Certification fees area.

Clients now have a choice as to use RSM to carry out Engineering work, or use an external Engineer. RSM sets the benchmark for these fees, and external Engineers have to price the Engineering work on a competitive basis. It is therefore important that RSM get this fee structure right, otherwise they will get all the Engineering work, or none of it.

In general, RSM proposed Engineering fees for most categories appear to be reasonable, as many of these categories have been taken up by external Engineers. Where this is not happening is in the Broadcast area, where almost all Engineering work is done by RSM.....external Engineers can not even compete with this existing and proposed pricing, due to a number of reasons.....

1.External Engineers need expensive databases software and updates, and even radio measuring equipment, to process Engineering work . Cost recovery is required and needs to be reflected in their charges, which need to be much higher than the basic category types. RSM has spent tens of thousands of dollars on software in recent times, yet their proposed Engineering costs basically remain the same for all Broadcast Categories.

2.PIB39 requires extra Engineering tasks for Broadcast work; e.g. Intermodulation assessments, Safety service, Land mobile, Aero Mobile assessments. There is also the extra time consuming work of preparing from 7's and 8's, cover sheets, certs etc. These extra requirements involve much additional time and this has to be passed on in costs to the client.

3.External Engineers are required to access all relevant licence information from the SMART database, as part of the Engineering processes. The old system, PRISMS.mdb/ Prisms Lite, which is very efficient and quick, can not be used as it does not include suppressed or planned licences. The **only** method of extracting this information is cumbersome, extremely slow, and very frustrating. For example, to do an area search for one intermodulation run, 5 or 6 area searches are needed to cover the frequency range and these can take up to an hour **EACH**, if the system works at all. External Engineers have no choice with this, but RSM can do a whole Intermodulation run in 2 minutes!!!!

RSM need to revisit Engineering Costs for Broadcast categories, as their proposed costs are far too low and not competitive , as evidenced by RSM retaining almost all the Broadcast work. It is considered that \$1500-2000 is not unreasonable for these categories, which is much less than some other international authorities charge. External Radio Engineers need to get some return in order to survive, whereas RSM staff get paid, no matter what happens

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