



The Manager, Spectrum Licensing Policy  
Australian Communications and Media Authority  
PO Box 13112  
Law Courts  
Melbourne VIC 8010

**RE: Draft Five-year spectrum outlook 2022-27 - consultation 12/2022**

Noting item 10, Table 9 “Radiocommunications (UHF CB Radio Equipment) Standard 2011 (No. 1)” in the draft FYSO, GME wishes to consult with ACMA on 2 separate questions and to potentially consider some minor changes to the CBRS class licence and the associated standards.

**Question 1**

GME suggests some next steps in the transition of CBRS to 12.5kHz channels. Since 25kHz UHF CB radios have not been sold for some years now, the UHF CB telemetry channels 22 (476.9500MHz) and 23 (476.9750MHz) could now be designated as narrow band (12.5kHz). Furthermore, GME suggests that channels 61 (476.9375MHz), 62 (476.9625MHz), and 63 (476.9875MHz), can now be made available for narrow band (12.5kHz) data transmission. GME suggests that if such provisions would be made, the allowed duty cycle and purpose of transmissions could now be cautiously expanded, to account for the fact that the number of channels would be increased from 2 to 5.

Alternatively, if there is a large population of 25 kHz CB telemetry devices still in use, CB radios could be allowed to operate on the currently unused channels 61, 62 and 63, but with a 6.25kHz channel bandwidth, so as to occupy the guard bands of the existing 25kHz channels.

**Question 2**

GME suggests modernisation of the CBRS class licence, as it relates to transmission of signals that indicate a CB station’s geographic location. This has now become a very popular feature in some radios. However, GME suggests that the specific limitation of location data duty cycle to 10 seconds in any period of 60 minutes is too punitive and negatively impacts the radio users that wish to share their location. GME suggest that the limitation is removed in the case when the CB station transmits location signals as a data burst appended at the end of a voice transmission. Instead, the location data burst length at the end of a voice transmission should be limited to 400ms, without any other long-term limits on the duty cycle. In comparison, a transmitter release tone (“roger beep”) is currently allowed in AS/NZS 4365, also without any limits on the long-term duty cycle. GME suggests this update in light of a) users’ complaints about insufficient location updates caused by the existing duty cycle limit, b) GME’s implementation of the short location data burst being non-intrusive and barely perceptible to the users.

In pursuing these suggested changes, GME will keenly liaise and collaborate not just with ACMA, but also with Standards Australia, and the industry, as required.

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