I would like to submit my views on the matter of the proposal to remake the CB class licence for 2025.   
  
**The emergency call channels (HF channel 9 and UHF channels 5 and 35)**

The use of CB radio for emergency situations has greatly declined since its original implementation. The Emergency channels have either been ignored or obstructed by some organisations and individuals facilitating their use.  
I have experienced situations where an emergency channel was being used for point to point co-ordination of operations only to be interrupted by an “official” station announcing their presence and channel use.  
 Their official designation as emergency channels is often ignored or avoided and other channels are often used for formal emergency situations.  
eg. UHF Ch13 is commonly used by RFDS for air to ground co-ordination.  
  
I propose the removal of the UHF CH5/35 emergency channel as this is blatantly ignored and poses more of a hazard than benefit. The repeater allocation attracts interference.  
  
An official channel should still be retained to provide for general use guidelines.  
UHF Ch9 to align with HF Ch9 and create a common easily recognisable allocation.  
 The use of the channel be designated as an URGENT/emergency co-ordination channel. While it is highly unlikely anybody would use the CBRS as a primary form of emergency communication, the designation of channel reduces the chance of interference and provides some clearance for local emergency operations and co-ordination that is available for open access.   
   
The use of UHF Ch22 and Ch23 has largely been ignored and under used.  
The restrictions on the use and type of telemetry are an impediment to it’s good use. Users are aware of the legacy 25kHz issues and new 12.5kHz allocations and due to the low population density and affordability of new radios the channel interference is minimal.   
 The allocation of the channels for telemetry should be retained but the restrictions on the operation of the channel be reviewed and removed.   
The allocation be “Telemetry/data” 12K5F2D so that the only restriction be on bandwidth of the channel and not on the protocol or application of an otherwise FM modulated signal.

I would further like consideration be given to the use of digital voice on the CBRS. Radios and modems are currently available which are capable of digital voice operation. The ACMA should not ignore the popularity of such modes and radios and be prepared ahead of their availability to provide a suitable and functional framework in the class licence. Given the concerns of the 12.5KHz allocations of channel 61,62 and 63 these channels could be allocated to C4FM digital voice modes which inherently are 12.5KHz bandwidth.