



3 June 2025

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
P.O. Box 13112
Melbourne VIC 8010

Subject: Follow-Up Submission – Emergency Channel Retention in CB Radio Arrangements

Dear Manager,

Thank you for the opportunity to provide additional input on the June 2025 consultation regarding changes to the Radiocommunications (Citizen Band Radio Stations) Class License. This letter supplements my previous submission dated June 2, 2025, particularly concerning Question 1: the continued reservation of HF channel 9 and UHF channel 5 for emergency use.

In my initial submission, I proposed a targeted retention strategy: maintain HF channel 9 and one UHF emergency channel (preferably channel 5) in their current designation. I would like to expand on the strategic rationale for preserving these frequencies for emergency use, beyond the question of actual monitoring activity.

While the practical likelihood of a dedicated listener being present on an emergency channel may be uncertain, due to the decline of fixed monitoring posts, a meaningful pattern of persistent use exists across regional and remote Australia. Many CB operators continue to set their transceivers to scan emergency frequencies. This means that even without formal oversight, these channels retain their latent *tactical* utility: a distress call may still be heard by a passing motorist, a property owner, or a volunteer with their radio switched on.

However, the *strategic* argument is even more compelling. In a major emergency, such as bushfires, flooding, or a failure of conventional communication infrastructure, these reserved channels act as common reference points. Their value lies not in continuous activity but in their established function. By preserving these channels, ACMA allows emergency services, community volunteers, and citizens to come together on a shared frequency architecture during times of crisis.

This type of strategic redundancy—where capacity remains dormant under normal conditions but becomes crucial when systems are stressed—is essential to resilient communication planning. The value lies not in constant use, but in dependable availability. For this reason, I reiterate my support for the ongoing reservation of HF channel 9 and UHF channel 5 for emergency use. Their retention represents a low-cost, high-value safeguard within the broader public safety framework.

Yours sincerely,

Dr Henry Prunckun

