



2 June 2025

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

**Subject: Submission on Changes to the CB Radio Arrangements – June 2025
Consultation Paper**

Dear Manager,

Thank you for the opportunity to comment on the proposed changes to the Radiocommunications (Citizen Band Radio Stations) Class Licence 2015, as outlined in the June 2025 consultation paper. I appreciate the Authority's commitment to ensuring that the CB radio framework remains practical, safe, and fit for purpose. I am writing to share my views on Questions 1 and 2 of the discussion paper, both of which pertain to public safety and spectrum utilisation.

Regarding Question 1, on whether HF channel 9 and UHF channels 5 and 35 should continue to be reserved for emergency use, I support a targeted retention approach. Specifically, it is my view that the emergency-only designation should remain for HF channel 9 and one UHF emergency channel (ideally channel 5). In contrast, the second UHF channel (channel 35) could be released for general or conditional use, depending on further monitoring and stakeholder feedback.

This compromise acknowledges the vital role these channels can play in remote or emergency contexts, particularly where mobile coverage is unavailable, while recognizing that the use of CB emergency channels has declined due to the widespread availability of mobile phones and the Triple Zero system. By retaining at least two designated emergency channels, ACMA preserves essential fallback capacity for public safety while allowing more efficient use of underutilised spectrum.

On Question 2, which concerns the future use of UHF channels 22 and 23 and the possible introduction of channels 61, 62, and 63 for telemetry and telecommand, I support a mixed-bandwidth and incremental expansion strategy. Specifically, I recommend that channels 22 and 23 remain at 25 kHz to preserve backward compatibility for existing telemetry users, while channels 61 to 63 be opened as 12.5 kHz narrowband channels dedicated to new machine-to-machine and data applications.

This proposal balances innovation with inclusivity. It avoids compelling existing users to upgrade their equipment prematurely while encouraging future-oriented applications to adopt more efficient narrowband standards. Additionally, it introduces extra capacity for telemetry users in a manner that aligns with good spectrum planning and conforms to international trends.

In conclusion, I commend the ACMA for its thoughtful review and for inviting public input. I support a carefully measured approach that maintains essential emergency capacity, supports legacy users, and fosters future growth in CB-based data applications.

Thank you once again for the opportunity to contribute to this important public safety and communications issue.

Yours sincerely,

Dr Henry Prunckun

