

Submission to ACMA: Changes to CB Licence Arrangements (Consultation Paper – June 2025)

Submitted by: Matthew Luchterhand

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1. Frequency Modulation Use in the HF Band

I have no objection to the proposed allowance of frequency modulation (FM) in the HF band.

2. Initiating Contact on HF Channels 11 and 16 and UHF Channel 11

I have no objection to the removal of the current requirement to initiate contact on these channels.

3. Consent of an Inspector about Altering a CB Radio

I have no objection to the removal of this requirement.

4. Prohibition on Certain ‘On-Air’ Conduct

I have observed offensive language and harassment on CB radio, particularly on urban repeater channels.

While such behaviour may already be addressed under general legislation, I support retaining a reference within the class licence as a reminder to operators of expected on-air conduct. This could be included as an advisory Note rather than a regulatory clause, reinforcing respectful and responsible use of the service.

5. Identification of a CB Radio – Additional Duty Cycle

I have no objection to this proposed change.

6. Directions Given by Inspectors and Other Persons

I have no objection to this change.

7. A CB Radio Connected to a Telecommunications Network

I support the implementation of this change. It is reasonable to expect that interfacing a CB radio to a phone or computer would typically be done via an audio-level interface (e.g., line-level connections). I support the proposed update, as it aligns with current labelling standards and recognises common modern practices.

8. Use of Voice over Internet Protocol (VoIP) Applications

I support this change. However, I suggest including an explanatory note acknowledging that some services may be branded as “RoIP” (Radio over IP) rather than VoIP. Clarifying this would

help avoid confusion among users and support consistent interpretation of the updated regulations.

9. Formatting and Other Drafting Changes

I support the proposed formatting and drafting improvements.

10. Other Matters: Emergency Communications on HF Channel 9 and UHF Channels 5 and 35

As someone who has casually monitored UHF CB emergency channels, I acknowledge that genuine emergency transmissions are rare in urban areas. The near-universal access to mobile phones means most people are better served by contacting emergency services directly.

However, in semi-urban and regional areas, CB radio plays a more significant role—especially during disasters or widespread power outages when mobile and landline networks may be unavailable. In such cases, dedicated emergency channels offer a simple, accessible communication path.

The removal of these dedicated channels would likely eliminate any remaining viability of CB radio as a tool for emergency monitoring. Scanning through all channels to find an emergency call—especially amid high volumes of unrelated but legal traffic—would be impractical.

With over 50 licensed CB Ch5 repeaters across Australia, I believe there is still value in maintaining these channels. I strongly recommend retaining UHF 5 and 35 (and HF 9) for emergency purposes.

11. Channel Arrangements for Data Transmission (Telemetry and Telecommand)

I am not a user of this functionality and therefore offer no comment.

12. Channels 22 and 23

I am not a user of this functionality and therefore offer no comment.

Closing Statement

Thank you for the opportunity to provide feedback on the proposed updates to the CB class licence. I support modernising the regulations and improving clarity, but also urge ACMA to retain features that enhance community safety and usability—particularly the emergency channel provisions.

Please feel free to contact me should further clarification be needed.

Matthew Luchterhand