

Mr Peter Middleton
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Dear ACMA,

I would like to make a submission in relation to the proposed changes to the ACMA's Class Licence 2025.

I've been involved in CB radio since 1979-ish. (I was 7 in 1979. I'm now 53) So I've seen a few changes over the years, while growing older. My parents used to pay to get a licence to use our 27MHz 11 Channel (Australian), and then progressed to 40 CH 27MHz. Then the swap to UHF.

I currently have 2 UHF radios installed in my 4wd, I do a lot of travelling in my caravan with other people. I also have 2 5W handheld UHF radios. So, I'm experienced.

Prohibition on certain 'on-air' conduct

The idea of a State Police Service/Force/whatever ever 'policing' harassment over the UHF radio network is just as stupid and leaving the ACMA do it. Maybe even slightly more stupid. You're right about the over-reliance on cellular phone networks. You only need step a little way outside the major cities like Brisbane (where I'm from) and the phone signal sharply drops away. And I'm talking Mt Mee National Park and the like. The alternative, though, requires volunteers, which is harder to manage.

Sadly, I don't think there's a right answer here given the lack of complaints owing to the apathy in the light of a perceived lack of action.

Emergency communications on HF channel 9 and UHF channels 5 and 35

This would be catastrophic. The combination of over-reliance on and unreliability of cellular mobile phone coverage in Australia - with its vastness – leaves many regional and rural (especially Outback) traveller without a mean of communication.

You don't even have to travel far from the metropolitan areas to find yourself out of cellular mobile phone coverage.

While UHF Channels 5/35 requires both a repeater network and volunteers to monitor it, removing the use of these two channels would be a dangerous eventuality. On the off chance you're somewhere like Mt Mee National Park, on the outer fringes of Australia's 3rd largest city, and an accident befalls you, then you are at the mercy of some wonderful volunteer organisations. There is no mobile service in this area, due to lack of population and terrain.

UHF Channels 5/35 could remain the difference between life and death.

Initiating contact on HF channels 11 and 16 and UHF channel 11:

Instead of dropping Call Channels (UHF CH 11), it might be a better idea to codify some of the channels that get used for particular purposes, Channels 10, 18, 29 & 40.

UHF Channels 29 & 40: The Highway Channel

Channel 40 (and Channel 29 on the Pacific Highway) then legally becomes the highway channel (not just a "Truckies" channel even though they will be the primary users).

Channel 10: The State Forestry and National Parks / the Offroad Channel

Channel 10 should be solidified to the National Parks/State Forestry call channel.

This would allow places like the Simpson Desert National Park make it **mandatory** for all users to be tuned into and making regular calls on UHF10 when in the dunes.

A lot of people mistake this as a suggestion, which it is not.

With a codification in legislation and Class Licence, there would become no 'wobble room'. No IF's, no "BUT's" and definitely no "MAYBE's".

Fine.

Hefty Fine.

It's a safety thing in places like the Simpson Desert, as much as a sand flag.

UHF Channel 18: The Caravanners Channel.

With the disgraceful and predatory behaviour of a large percentage of truck drivers towards caravanners and people who tow heavy trailers, a large proportion of people who tow caravans or heavy trailers on a regular basis are either forgoing installing UHF radios or migrating to UHF Channel 18 to converse with other caravanners.

Hence, UHF CH18 could become the "Caravanners/Heavy Trailers Channel".

I am campaigning my State and the Federal Government to introduce a new condition on drivers licences (like A for Automatic, M for Medical Certificate, or S for Spectacle) around the country (hence, the Federal Government) to be able tow trailers requiring brakes.

This is not meant to come into immediate effect for everyone right away, but for people who obtain their Open drivers licence after a particular date.. (New Australian licence holders)

This generational change will become like the motorbike's Q-Ride or Q-Learn programs, which are done by accredited training providers and paperwork taken to their relevant licence issuing authority.

As a part of this, I think it's vital that Caravanners and people who tow heavy trailers (only those trailers requiring brakes) to be linked into the UHF Radio and that Oversized Pilots on the highway be also connected to large, articulated "C" class vehicles, which can be up past 6t, for the safety of all road users and to get loads through where needed.

Even prior to any success with the licence condition addition, I feel it's vital to limit commercial use on these channels, such as road workers, etc.

Hence the formalization of UHF Channel 18, in this list of noted channels.

Additional Comments

No Commercial Use

Personally, I would like to see the return of the “No Commercial Use on UHF Citizen Band” condition, with certain, very specific exceptions.

I do many kilometres with my caravan and I am often joined by my wife. On the occasions my wife joins me, we often travel with another couple who are significantly less confident in towing their caravan. Or we travel in a group.

We select a UHF channel (often UHF Channel 25) to hold our conversation, while I monitor and communicate with the trucks on UHF Channel 40 (the ‘Highway Channel’). We often find businesses running truck operations within their yards on UHF Channel 25 (or, even UHF Channel 18) and become abusive if you step on “their” channel, as though they have ‘exclusive use’. Pointing out that they are on the UHF Class Licence, meaning the channel is open to all users, is next to useless and is always met with more aggravation from the company that is using that channel.

This tends to be their own fleet of trucks, having purchased UHF CBs to save the cost of

Then you swap channels and travel down the road and find someone on that alternative further down the road.

This abuse is the reason we don’t just travel and communicate on the Highway Channel in the first place.

Proposed Exceptions to the “No Commercial Use” rule:

Trucks and their highway pilots need to remain on the “Highway Channel”. Communication between truck and the pilot is a legal requirement of the load. Pilots are also needing to remain on the Highway Channel to maintain communication with other trucks on the road, to communicate with and/or warn other trucks (and, in certain cases, other road users with UHF Radios, such as caravanners) of the other vehicles need to give way.

I appreciate and understand that, so they should be allowed an exemption

On property farm use is another exception, but only so far as it doesn’t interfere with other radio traffic. A specific requirement of the exception that should be emphasised is that no harassment of other users will be tolerated and any infraction (investigated by State Police and forwarded to the ACMA) should be dealt with a ban for that farm and/or personal user.

With many thanks,

Peter Middleton