

**Submission to the Australian Communications and Media Authority on the
Consultation Paper for Changes to CB Radio Arrangements**

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Table of Contents

Introduction	2
Changes to the CB Class Licence 2025.....	2
Frequency Modulation Use in the HF Band.....	2
Initiating Contact on HF Channels 11 and 16 and UHF Channel 11	2
Consent of an Inspector About Altering a CB Radio	3
Prohibition on Certain ‘on-air’ Conduct.....	3
Identification of a CB Radio – Additional Duty Cycle	4
Directions Given by Inspectors and Other Persons.....	4
A CB Radio Connected to a Telecommunications Network	4
Use of Voice over Internet Protocol (VoIP) Applications	4
Formatting and Other Drafting Changes.....	4
Other Matters For Comment Not Reflected in the CB Class Licence 2025.....	5
Emergency Communications on HF Channel 9 and UHF Channels 5 and 35 ...	5
Modern-day Use of CB Emergency Channels	5
The Need for Three Emergency Channels.....	10
Compliance Operations	11
Summary	12
Channel Arrangements for Data Transmission (Telemetry and Telecommand)	13
Bibliography	14

Introduction

The National Executive of Radio Rescue Emergency Communications Incorporated (RREC) thank the Australian Communications and Media Authority (ACMA) for the opportunity to respond to the proposed Radiocommunications (Citizen Band Radio Stations) Class Licence 2025, and changes to the operating arrangements for CB radio in Australia. We also thank ACMA for the chance to express our views on the use of the CB emergency channels in modern times.

RREC is a volunteer Public Benevolent Institution whose primary role is the provision of monitoring services on the CB emergency channels. Formed in South Australia in 2019 from members of other similar groups whose origins date to the legalisation of CB in Australia in 1977, RREC endeavours to not only provide this monitoring service, but also represent CB monitors and CB users to the Australian Government and its agencies (e.g. ACMA) when necessary on all matters involving the Citizen Band Radio Service.

With this in mind, RREC has chosen to respond to all of the matters raised in the ACMA consultation paper, although the subject of the CBRS emergency channels has been covered in more detail.

Changes to the CB Class Licence 2025

Frequency Modulation Use in the HF Band

We agree with the ACMA's assessment of the use of FM on the HF CB band. We feel this change may provide an opportunity for CB enthusiasts to better use the HF band, as well as open the market for equipment already approved for use in the USA, provided Australian Standard AS/NZS 4355 is amended.

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

We agree with the ACMA's view that the use of a call channel should no longer be required. While the HF call channels are still used to some extent, the requirement that operators must initiate contact on a call channel should be removed, allowing

greater flexibility to operators for the use of other channels for regular groups. We would assume the use of HF channels 11 and 16 as call channels could continue as a *gentleman's agreement* similar to the way HF channel 8 and UHF channel 40 are used as road channels, without the need for designation within the class licence. UHF channel 11 is rarely used as a call channel, especially in regions with a general-use repeater.

Consent of an Inspector About Altering a CB Radio

Given the CB band is intended as a non-technical hobbyist band, we agree there should be no circumstances within which a CB radio needs to be altered for the purposes of testing and that, should this be required, a more suitable alternative would be through an apparatus licensing option, just as other services require if operating outside the parameters of their standard licensing framework.

Prohibition on Certain 'on-air' Conduct

We do NOT agree with the concept proposed by ACMA on this subject. One reason ACMA receive few complaints is the belief among CB users that ACMA have little to no interest in enforcing the CBRS class licence or taking action against any CB operator breaching the class licence or the Radiocommunications Act.

RREC has experienced first-hand the difficulties getting ACMA to act when two of our volunteers were harassed, on emergency channels, by CB users in the Sydney region. Comments from local police indicated they lack the resources or abilities to act against CB users, and that ACMA would be better able to locate the users and act accordingly.

We firmly believe ACMA should retain this prohibition within the class licence and, therefore, the legal responsibility to utilise their training and equipment to locate offending stations and take appropriate action. Police, other than the various technical units, have very little understanding of the laws surrounding radiocommunications and lack the training or equipment needed for them to locate offending stations and gather the evidence needed to act on a complaint, unlike ACMA officers.

Identification of a CB Radio – Additional Duty Cycle

RREC has no objection to the changes proposed by ACMA and agrees that this will help allow operators to explore a feature becoming more common than it was when the class licence was first introduced.

Directions Given by Inspectors and Other Persons

We have no opposition to the changes proposed and believe these will help all concerned to better understand the circumstances surrounding these directions.

A CB Radio Connected to a Telecommunications Network

We believe the removal of this condition from the class licence is logical, especially given the fact that the vast majority of connections to a telecommunications network would now involve a connection, as stated, through a computer or other device, to an approved modem to the NBN network, or via a wireless adapter. As the NBN modem or wireless adapter would need to already comply, there should be no need to place this stipulation in the CBRS class licence.

Use of Voice over Internet Protocol (VoIP) Applications

We fully support the introduction of VoIP into the class licence. This has been tested and proven both operationally sound and beneficial by a number of repeater owners who have used a CB station to link to their repeater via a VoIP application. We believe this would make it easier for owners of UHF CB 5/35 emergency repeaters to allow the remote monitoring of their repeater by operators not within the repeater coverage area, or without their own CB station, thereby improving the use of the repeater and benefiting the community.

Formatting and Other Drafting Changes

The proposed changes are both logical and acceptable. However, we would ask ACMA to consider the addition of one item in the definitions - that of *emergency*:

emergency signal means one or more of the following:

- (a) a request for assistance;
- (b) a signal of distress;

(c) a message that is related to a request for assistance or a signal of distress.¹

Although this definition appears in the *Radiocommunications (Interpretation) Determination 2025*, there is still much confusion among CB users about what kind of transmissions meet the criteria of emergency for the three emergency channels.

We would suggest that adding this to the class licence definitions, whether or not it matches the definition within the Determination (perhaps removing the word “signal”), would help all users, including monitoring bodies, better understand the acceptable use of the channels, just as adding the channel numbers in a previous review helped users understand what channel the frequency referred to.

Other Matters For Comment Not Reflected in the CB Class Licence 2025

Emergency Communications on HF Channel 9 and UHF Channels 5 and 35

During the 31st Parliament, the Minister for Post and Telecommunications, the Hon. Anthony Staley, recognised the importance of emergency channels on the CB band when he responded to a question from Mr Raymond Braithwaite, Member for Dawson (QLD), regarding the allocation of a channel for CREST:

We recently amended the Wireless Telegraphy Regulations and we set aside a special channel-channel 5- for use as an emergency calling channel within the citizen's *[sic]* Band Radio Service. This channel is monitored by several organisations for emergency purposes.²

Since then, every version of the CB regulations has included 27.065 MHz, 476.525 MHz and 477.275 MHz as legally designated emergency channels, and RREC can find no valid reason to change this designation in this or any future version of the class licence.

Modern-day Use of CB Emergency Channels

While there is little doubt that the introduction of mobile telephone services has greatly reduced the need for the CB emergency channels, it has not completely abolished their use. These channels, and UHF CB in general, continue to be utilised outside of the major cities, particularly where mobile phone coverage is poor or where

¹ Commonwealth, “Radiocommunications (Interpretation) Determination 2025,” F2025L00362 § (2025), 16, <https://www.legislation.gov.au/F2025L00362/asmade>.

² Commonwealth, “Parliamentary Debate (Hansard)” (House of Representatives, April 3, 1979), 1390, https://parlinfo.aph.gov.au/parlInfo/genpdf/hansard80/hansard80/1979-04-03/0028/hansard_frag.pdf;fileType=application/pdf.

natural disasters routinely cut other forms of communications. In 2022, some communities on the NSW mid-north coast lost the ability to call Triple Zero for days. ABC News reported, “Outside of Lismore, entire communities were left in complete communication isolation for days, unable to even make calls to triple zero.”³

The benefit of CB, and as an extension, the CB emergency channels, was highlighted in a follow-up story on NSW communities using UHF CB for back-up emergency communications. ABC News reported:

Radio expert John Miller is helping about 20 communities across the Northern Rivers set up their own radio networks as a failsafe form of communication during future disasters.

He said the issue with almost all modern telecommunications systems, including mobile phones and internet, was that they relied on land-based infrastructure networks that could lose power or be damaged in fires and floods.⁴

With almost every farm, truck, 4WD and caravaner now having UHF CB installed, it is this band rather than HF that is more widely used in regional areas, with UHF 5/35 repeaters being installed in some regional areas for this specific purpose. Where 5/35 repeaters are not operational, the monitoring of channels 5 and 35 in simplex mode still allows RREC, and other monitors, to respond to calls for help, albeit from a reduced coverage area than possible through a repeater. Prior to the widespread introduction of UHF CB repeaters, monitoring of the emergency channels in simplex mode was common practice.

RREC also feels the view of ACMA that only Triple Zero provides access for callers to “qualified dispatchers”⁵ ignores the history of all CBRS monitoring bodies. The various monitoring bodies have a history of training their monitors to a high standard, allowing them to respond to calls and provide the emergency services with accurate information on the incident.

RREC understands that during an emergency, any channel (or frequency) can be used; however, only the emergency channels enjoy the protection of law for this

³ Leah White, “Calls for Inquiry into Triple Zero Response Which Left Communities in Isolation during NSW Floods,” ABC News, March 16, 2022, <https://www.abc.net.au/news/2022-03-16/calls-for-inquiry-flood-communications-fail-northern-nsw/100910284>.

⁴ Leah White, “Flood and Fire-Prone Communities Turn to UHF CB Radio Networks in Disaster Preparation,” ABC News, December 22, 2022, <https://www.abc.net.au/news/2022-12-23/disaster-communities-go-back-basics-with-cb-radios/101652486>.

⁵ Australian Communications and Media Authority, “Changes to CB Radio Arrangements: Consultation Paper” (Commonwealth of Australia, June 2025), 6.

specific use. Even if a call for help is taken on another channel (e.g. UHF 40), the fact that there is a legally designated emergency channel the call can be shifted to, rather than having to search for a clear channel first, could save valuable minutes and could see an ongoing emergency moved away from other users.

The following are just brief examples of RREC members' activities on CB emergency channels.

Clarence Valley, NSW – CLR05

This repeater is monitored by a number of local operators, both RREC and independent. Reports from the repeater licensee, a member of RREC, indicate that this emergency repeater is utilised by the community where UHF CB is common among the farmers and the general public. Reports are regularly received regarding straying cattle and wildlife, requiring reports to the police. During the March 2025 floods, the repeater was used regularly for information on road closures, detours due to floods, and bogged vehicles requiring assistance from the SES or a recovery service. This community relies on this emergency repeater, and therefore the emergency channels, to provide communications support through some of the worst fires and floods NSW has seen. Obviously, some of these calls require the monitors to contact emergency services such as police, fire and SES. Others require messages to be passed to people, or contact with local services such as road service, tow trucks, etc.

The CLR05 emergency repeater is one example of the UHF CB emergency network established to provide an entire community with reliable communications in an area often hit by natural disasters that disrupt mobile phone, internet and home phone services.

Limestone Coast, SA

RREC members have reported that UHF emergency channels have been utilised during some of the region's worst emergencies, including the Keilira fires (New Year's Eve 2019) and Wandilo fires (February 2000), when other channels were unusable due to interference from regular chatter or distance. Calls often required contact with emergency services or allowed these services to communicate directly with the public (e.g. contact with farm fire units).

RREC members in this region consider the CB emergency channels a vital backup communications network for the community.

Murraylands, SA

During the River Murray flood event, UHF channel 5 (simplex) was widely monitored and used, especially by tourists seeking advice on flood-affected roads. Calls regarding extremely slow traffic on the highway near Murray Bridge were also received on this channel. Information from these calls was relayed to the police, with calls regarding flood-affected roads reported to the local council. Requests for information on appropriate roads to travel involved contact with both police and the SA Traffic Management Centre (TMC).

Perth, WA – PER05

RREC members regularly monitor the Perth 5/35 repeater and have reported that local operators have slowly started to utilise the emergency channels to call for help from mobile blackspots, or when a mobile telephone is not available. Monitors report at least one call per week for incidents such as breakdowns and bushfires, which require contact with a service of some description to obtain the assistance needed (e.g. fire, road service, tow truck service). The channels are also used by farmers and fire services during fire calls. Our Perth members also report that these calls increase during fire season.

Perth monitors have made RREC aware of an incident that occurred just prior to the PER05 repeater being reactivated by the licensee. An elderly female with the callsign “Lollipop” made a call over the Perth channel 4/34 repeater, stating “medical emergency.” At the time, her mobile phone was on charge and her CB was beside her bed, so she used this to summon help. However, another operator played music over the call, preventing her from obtaining help. This incident highlights the need for channels designated for emergencies only, rather than relying solely on *general chat* channels and repeaters.

Ouyen, Victoria

In February 2024, severe storms hit Victoria, cutting power and mobile phone services across the state.⁶ Reports from Ouyen indicate that UHF channel 5 was used for emergency calls reporting storm damage and other matters requiring emergency services. In these instances, some emergency services monitored the UHF CB emergency channel so information could be reported directly to them. However, even where these services may utilise a different channel, monitors on the emergency channels could still receive calls and relay the information to the emergency services either via UHF CB or, if necessary, through another monitor positioned at one of their stations (RREC utilises licenced VHF-Hi band frequencies for use by members to establish monitor-to-monitor links).

Other Regions

RREC is aware of other instances of the UHF emergency channels being used by communities for communications in an emergency, or by emergency services to communicate with the public, including rescue helicopters in some regions. The availability of a channel dedicated to emergencies greatly assists in these vital communications tasks.

RREC is also aware that in many regional areas, emergency services often have UHF CB installed in vehicles and/or their station. Indeed, government inquiries following the summer of 2003 bushfires reported the use of UHF CB by multiple fire services, and recommended UHF CB be included in future communications plans.⁷

Multiple communities include UHF CB as a form of emergency communications within a local emergency plan. For example, in a document prepared for Byron Shire Council, Dr Jean Renouf said, “CB UHF radios is typically what communities use to communicate locally in times of phone and internet disruption”⁸ while the Burdekin

⁶ Telstra, “Victoria Storm Recovery: What You Need to Know,” accessed June 23, 2025, <https://www.telstra.com.au/exchange/vic-storms>.

⁷ Commonwealth, House of Representatives Select Committee into the recent Australian bushfires, “A Nation Charred: Inquiry into the Recent Australian Bushfires,” Committee Report (Canberra: Commonwealth of Australia, October 23, 2003), app. F, https://www.aph.gov.au/parliamentary_business/committees/house_of_representatives_committees?url=bushfires/inquiry/report.htm.

⁸ Jean Renouf, “Emergency Communications Guide For Communities: An Introduction” (Safer Future, July 2024), 6, <https://www.byron.nsw.gov.au/files/assets/public/v/1/hptrim/community-services-community-disaster-resiliencerecovery-projects-emergency-communications/community-emergency-communications-guide-safer-future.pdf>.

Shire Council Communications Sub Plan, created by the Local Disaster Management Group, shows that UHF CB is fitted into multiple SES vehicles and bases,⁹ with the VMR Burdekin Radio Network monitoring UHF CB channel 5 (i.e. emergency channel).¹⁰

The ability for these services and communities to have a single channel designated Australia-wide for emergencies would not only assist them in serving their community in times of need, but would also allow visitors to the region to know what channel is used for this purpose.

The Need for Three Emergency Channels

UHF Band 5 and 35

While many operators would submit that there is no use for channels 5 and 35 to be reserved for emergency use only, we would submit that this is not the case. It is true that 5 and 35 are not used as extensively as they once were, largely replaced by mobile telephones. However, as ACMA are well aware, these networks can and have failed, resulting in restrictions in access to Triple Zero.¹¹ During these times, and severe emergencies such as fires, floods, storms, etc., the UHF CB emergency channels can, and are, used to help provide emergency communications to the public.

Given that UHF CB repeaters require two channels to operate, we therefore submit that both UHF channels 5 and 35 retain their legislated designation as emergency channels.

We would also urge ACMA to simplify the conditions for the operation of transportable repeaters on channels 5/35 under Part 6 of the *Radiocommunications Licence Conditions (Land Mobile Licence) 2015*, primarily:

⁹ “Communications Sub Plan” (Burdekin Shire Council, September 2024), 9–14, https://www.burdekin.qld.gov.au/files/assets/public/v/1/emergency-management/documents/communications_sub_plan__1_.pdf.

¹⁰ “Communications Sub Plan,” 13.

¹¹ Jesmine Cheong, “Telstra Slapped with \$3 Million Fine for Triple-0 Network Outage,” *ABC News*, December 10, 2024, <https://www.abc.net.au/news/2024-12-11/telstra-3-million-fine-triple-zero-outage/104709836>; Josh Taylor, “Optus Fined \$12m after Thousands Could Not Call Triple Zero during 2023 Outage,” *The Guardian*, November 7, 2024, sec. Business, <https://www.theguardian.com/business/2024/nov/08/optus-000-triple-zero-fine-2023-outage-acma>; “Telstra Warns of Potential Triple Zero Outage as Tasmanian Fibre Cables Undergo Repairs,” *Pulse Tasmania* (blog), March 26, 2025, <https://pulsetasmania.com.au/news/telstra-warns-of-potential-triple-zero-outage-as-tasmanian-fibre-cables-undergo-repairs>.

1. To remove the restriction of operation within 70 kilometres of a licensed 5/35 repeater, stipulated in section 28, subsection (1)(a), if the licensed repeater is non-operational and therefore unable to provide service to its intended coverage area - where an existing 5/35 repeater is off-air for an extended period, a transportable repeater could be used to provide the service until the fixed repeater is returned to operational status; and
2. To remove the requirement to obtain ACMA approval **prior** to the operation of a 5/35 transportable repeater, stipulated in section 28, subsection (3), providing records are kept and ACMA is notified at the earliest opportunity - disasters and emergencies often do not occur at convenient times, with the rapid deployment of a transportable repeater being essential to providing emergency communications to the community; and
3. Remove the restriction on linking a 5/35 repeater via a telecommunications network, contained in section 24, especially given the views presented by ACMA on the connection of a CB station to the telecommunications network given in this consultation paper.

HF Band 9

The HF Band (27 MHz) is not as widely used as UHF. However, RREC is aware that some 4WD enthusiasts retain HF CB equipment for use in heavily forested areas where UHF signals may have poor signal range. Given the majority of HF users are using SSB on the higher channels, the band is far less populated than it once was, and HF SSB CB equipment can be used to provide communications over a greater distance than UHF, RREC can see little benefit to the CB community in removing the emergency designation for HF channel 9.

Compliance Operations

RREC would like to express the need for ACMA to make reports of misuse of these channels a priority for compliance operations. Unlike reports of other “misuse” the ACMA may receive, reports from monitoring bodies or emergency services are usually a last resort, after attempts to clear the channels or educate the operators have failed. In many cases, volunteers have already done all they can to locate and identify offenders before the matter is reported to the ACMA. It is well to remember that

volunteer groups, whether they be monitoring bodies, emergency services or community groups, often have limited resources for tracking radio signals, unlike ACMA field teams.

RREC has had recent experience with reports to ACMA of emergency channel misuse, with little to no interest from ACMA in resolving these issues. In one instance, reports that included the name and address of offending stations resulted in little interest from ACMA, while complaints regarding another region resulted in an acknowledgement that misuse had been heard by compliance officers, but no action had been taken. We submit that this is partly responsible for CB operators failing to recognise the legal designation of the emergency channels (or indeed the class licence in general).

Prior to the class licence, almost every CB user knew that these channels and rules regarding the use of CB existed. It is only after the class licence, when ACMA and its predecessors lost interest in compliance operations on the CB bands and retailers promoted the CBRS as *licence-free*, that users began to believe the band was a free-for-all.

Summary

RREC believes the CB emergency channels, both UHF and HF, continue to serve a valuable role in public safety.

Having legislated channels for emergency calls also permits monitoring bodies, emergency services and community groups to publicise which channel they can be contacted on in an emergency, rather than having a different channel in every region, depending on what channels are available.

Although the emergency services have a number of options for intra-agency and even inter-agency communications, including the use of amateur radio through the Wireless Institute Civil Emergency Network (WICEN), information must first be received from the public, and here, there are limited options available when telephone and internet services fail.

The CB networks are the only radiocommunications option available to the general public without the need for operator qualifications and/or licensing, or

expensive equipment (e.g. satellite phone). Retaining emergency channels, protected by law for this purpose on both CB bands, regardless of how much or how little they are used, is essential, especially given the increasing number of communities utilising the CB band(s) as a form of emergency communications independent of other networks and systems. Only one life or one property needs to be saved to make this worthwhile.

Channel Arrangements for Data Transmission (Telemetry and Telecommand)

As RREC has no involvement with data transmission, we feel it would not be appropriate for us to make a comment on this subject at this time.

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