**Submission In**

**Response To Proposed Changes By**

**ACMA To The CB Licence Class**

**By**

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This submission is in response to recent proposal to change the conditions of the Citizens Band License by Australian Communications And Media Authority including introduction of FM and VOIP into the mix along with reclassification of UHF emergency channels 5/35 as general purpose.

CB or Citizen Band radio has been around in Australia since it was introduced in late 70’s on an 18 channel plan before expanding to 40 channels in 1982 with it becoming a main source of 2 way communications on a day to day basis for farmers, transport industry and emergency services.

In the Lower South East of South Australia where I’m located CB radio played a pivotal role in providing 2way communications for farmers, water tankers and Country Fire Service crews during Ash Wednesday 1983 as it filled in that gap when other forms of communication failed.

Late 80’s to early 90’s saw a decline in usage of 27 MHz for day to day and emergency communications with many users and businesses opting to utilised newly introduced 476-477 MHz UHF radio based on it being more cost effective and having clearer crisp signal thus relegating 27 MHz to a hobbyist band.

**27 MHZ Proposed Changes**

As part of recent proposed changes is to introduce FM into the CB band with Frequency Modulation on 27 MHz already proving to be very popular amongst users in United States and United Kingdom, by allowing FM on the Australian 27 MHz band it could very well revive CB radio but in order for this to happen ACMA has to take the following steps

1. Scrapping or lifting of type approved restrictions to allow importing of AM/FM base, vehicle and handheld radios from the USA and China

2. Provide a list of channels for 27 MHz FM including

\* Road \*International

\* Emergency \* General purpose

\* Call

3. Ensuring that the 27 MHz emergency channel is protected by law as wel

The proposal to maintain 27.065 as an emergency channel for those who call for assistance in a poor coverage area is a life saver however in order to see this channel utilised in an emergency situation as mentioned above refer to suggested step 1 ACMA must scale back or remove its type approved restrictions on imported 27 MHz radios of which are readily available on shopping sites like AliExpress and Amazon.

Removal of requirement to initiate communications on 27.085 AM and 27.155 LSB would free up those channels for general communications over long distance trips without the fear of being told to remove oneself from the channel to a vacant one.

Overall, the general concept of introducing FM into the CB band alongside AM, USB/LSB as already mentioned above on page 1 paragraph 5 could very well be what will promote and revive 27 MHz use in Australia as a secondary communications source for day to day and emergency communications during times of major disasters.

**UHF/Proposed Changes**

UHF radio plays an important role both in day to day/ emergency communications here in the Lower South East of South Australia also known as Limestone Coast which is approximately 10,334.2 km² consisting of major highways, expansive pine and blue gum plantations, thriving agriculture, forestry, and viticulture industries, the huge demands both logistical and economically for products from the region itself shows how essential 2-way radio communications is

Its not just transport, forestry, agriculture and viticulture industries in Limestone Coast who use UHF communications the Country Fire Service, State Emergency Service, SA Ambulance and South Australian Police in addition to Forest Industry Brigades utilise it for communications during emergencies where direct communication via the GRN isn’t possible

The Limestone Coast is very prone to major emergencies with the Riddoch Highway which runs from Port MacDonnell right up to Keith notorious for having serious accidents that shut down the highway itself even in parts where mobile phone coverage this is where UHF radio comes in handy with not only reporting an accident but also advising of road closures

Bushfires are also a major threat to the region with significant fires in recent times highlighting the effectiveness and efficiency of UHF communications on both emergency and general purpose channels

**2000 Wandilo Forest Fire**

MTG05 5/35 repeater stationed at the Bluff in 2000 allowed for communications between Country Fire Service crews, private farm units and bulk water carriers as well as a means of reporting any local emergencies if a member of the public was close to their radio.

**2002 Kalangadoo-Glencoe Rd grass fire**

Communications between Country Fire Service, private farm units and bulk water carriers on a general purpose channel allowed for efficient coordination of resources during the height of the fire.

**2019 New Years Eve Keilira fire**

It has been reported that during initial response and at height of the Keilira bushfire farm fire units struggled to communicate with each other on simplex channel 9 due to its line of sight limitations but after successfully reverting to the local emergency 5/35 repeater were able to coordinate better and allocate resources for asset protection and fire suppression

Subsequent bushfires at Lucindale/Blackford and Callendale in 2021/2022 also highlighted the pivotal and important role of both UHF emergency as well as general purpose channels during times of major fires.

Under proposed changes as stated in ACMA’s consultation paper on page 10 paragraphs 1-5 about potential reclassification of UHF emergency channels 5 and 35 to general purpose due to absence of documentation proving these channels are still required as same with AM Channel 9

However, despite the advancements in technology including mobile phones making calling 000 quicker allowing for timely response of emergency crews by qualified dispatchers you’ll find that quite a few areas around Australia especially here in the Limestone Coast still suffer from slim-nil mobile coverage this has been further exacerbated by the recent discontinuation of 3G mobile network.

In an emergency situation where there’s virtually poor to no mobile coverage and help is required UHF 5 &35 either as a repeater or simplex channels are the vital life saving link that helps saves lives whether its in the outback or rural areas.

**By removing the emergency channel status from 5/35 you’ll be doing the following things**

1. Putting lives at risk in areas where mobile coverage is poor to non-existent

2. Removing an important channel that is vital to communications between emergency services and general public where direct communication isn’t possible

3. Removing a critical channel that can provide updated information during major fires during summer

4. Opening the door to radio pirates who will jam up every UHF channel including 5 &35 therefore putting lives at risk if there’s no classification which states UHF 5 and 35 are allocated emergency channels and punishments/fines will be handed out if found to be misusing the channels for non-emergency use

**RECOMMENDATIONS**

\* Retainment of 5 and 35 as emergency channels in both simplex and duplex mode

\* Adding of an additional 2 emergency channels in 12.5 KHz repeater segment a good suggestion would be channels 45 and 75 both can be used in simplex and duplex mode to call for assistance and also work as secondary 2 channels between emergency crews as well

\* Allow for automated voice announcements, remote shut off/activation and conversation recording of non-emergency traffic on emergency repeaters to be installed

\* Implementation of an online reporting form via ACMA website for UHF radio users and repeater owners to submit reports pertaining to misuse of an emergency repeater or interference of emergency conversations including the option of uploading recordings and transcripts

\* Increased penalties and fines for interference and misuse of an emergency channel from the current amount of $165,000 to $300,000 with a minor infraction on the spot fine of $350, repeated offences maximum fine of $500,000 and 4 years prison as well as full confiscation of equipment.

\* Give local law enforcement the authorisation on behalf of ACMA to issue fines for both major and minor infractions as well as carry out confiscation of radio equipment in repeated offence situations

**VOIP & IT’S INTRODUCTION**

VOIP (Voice Over Internet Protocol) is slowly emerging as another form of 2 way communication with commercial PTTOC radios being increasingly purchased by businesses and companies as they offer full privacy via 4G and 5G mobile networks and ability to create individual channels or groups

With the increasing use of Zello as a form of PTTOC/VOIP communications on both Android and iPhones this app also has the same ability to also create individual channels and groups to transmit on including bridging via 27 MHz and UHF radio allowing for non-radio owners to communicate using their phone via Zello

This in itself is also a win win situation as it will allow for increased use of 27 MHz radio in Australia too even if its via PTTOC/VOIP although a little bit more can be done to promote the use of VOIP/PTTOC including the same scaling back or scrapping of type approval restrictions pertaining PTTOC radios purchased on AliExpress and Amazon

By doing this it would encourage the uptick of Voice Over Internet Protocol/Push To Talk Over Cellular communications usage as a hobby and day to day communications however it must not be by all means a replacement to using UHF and 27 MHz radio or even 000 to call for assistance as this form of communications relies on both home and mobile internet which is dependent on signal coverage

**SUMMARY**

After reading both consultation and draft radio communications (citizens band radio stations) class licence 2025 I can honestly say its well laid out and is well defined much likened to its predecessor but the above recommendations including retainment of 5/35 and channel 9 as emergency channels in addition the adding of a secondary 45/75 must be taken into serious consideration when publishing final radio communications class licence for citizen band radio stations.

By retaining UHF 5/35 whilst adding 45/75 as secondary emergency channels on UHF band in addition to channel 9 on AM won’t take anything away from the highly efficient Triple zero system in place it will provide the back up alternative in the event an emergency occurs in a poor/no existent mobile coverage area or should phone infrastructure fail during a major disaster

Inclusion of FM into 27 MHz 40 channel band plan will help revive CB radio in Australia with it already popular in USA and UK but there would need to be set channels allowed for use on FM away from the general use channels on AM and SSB so as to avoid any interference or bleed over.

Scaling back or removal of type approved restrictions on AM/FM transceivers from overseas will allow for 27 MHz FM communications to become popular not only as a hobby but also secondary day to day communications across all industries looking for a cheap and effective form for local operations

Allowing VOIP/PTTOC to be used also on 27 MHz band will also prove popular with those who have smart phones and access to apps like Zello to communicate with one another on CB radio using their phones instead of having to fork out money for radio equipment

In addition this will open up the doors for purchasing of android PTTOC radio equipment which acts the same as a conventional CB or 2way radio but works using VOIP/PTTOC the same type approval restrictions on purchasing this kind of equipment would need to be scaled back or removed to allow for VOIP/PTTOC to also take off on 27 MHz band.