

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Melbourne Vic 8010

RE: Proposed Changes to CB Radio Arrangements

Dear Sir / Madam,

I wish to provide personal comments on the above June 2025 consultation paper. Specifically, I wish to advocate for the retention of the three emergency communications channels: namely HF channel 9 and UHF channels 5 and 35.

While the ability to call Triple Zero to ask for assistance from emergency services organisations may now be commonplace, there remain valid reasons to retain the emergency channels:

1. There are many areas of regional and inland Australia not serviced by the 4G and 5G mobile telephone service coverage. The abolition of the 3G service has further exacerbated this situation. In such areas, the case for the retention of specific emergency channels is significantly heightened.

The suggestion made in the Consultation Paper to potentially confine the emergency channels only to areas “where access to mobile phone services and Triple Zero may be more limited” (pp. 6) may prove unworkable. For example, how would such an area be defined in legislation, and how might this provision be enforced in ‘fringe’ mobile phone reception areas where the mobile coverage might cut in and out during travel by road?

While I accept that emergency channels are more critical for remote and regional areas than an urban environment, in my view only universal enforcement of the use of these channels (i.e. in both urban and non-urban areas) would safeguard their intended function.

2. Should specific emergency channels not be retained, the chances of anyone receiving an emergency call on CB radio would be significantly reduced. For example, in the case of UHF CB, an emergency call might potentially be transmitted on any one of 75 channels (i.e. excluding channels 22, 23 and the continued exclusion of channels 61 to 63) and reception of that call would be left purely to chance (with the possible exception of utilising UHF channel 40).
3. In the case of UHF CB, my understanding is that potential transmissions on emergency channel 5 are currently boosted using radio repeaters located in some regional and remote areas. This greatly extends the range of an emergency transmission (compared to simplex channels) and improves the chances of such a call being received. In the absence of a specific emergency channel, anyone wishing to transmit an emergency call to as wide an area as

possible would need to know the repeater channel (if any) specific to that particular region to increase the chances of any response.

As a frequent road traveller to remote and regional areas I regularly enable a 'group scan' (the scanning of a limited number of specific channels) on my CB radio that includes UHF CB channel 5 in case an emergency call is transmitted. I know of other regular road travellers, including caravanners, that do the same. I very rarely do an 'open scan' of all available UHF CB channels. In the absence of an allocated emergency channel, I would be unlikely to receive an emergency call on any channel other than those few I am scanning.

I used to also regularly monitor UHF channel 5 in my hometown of Canberra, but very soon wearied of the regular, non-emergency messages being transmitted on the emergency channel – including at one time from a construction site in Woden. When I asked these users whether they were aware they were using the emergency channel, their response was along the lines of "yes, but everyone uses it"!

My advocacy for the retention of the current emergency channel allocations is strongly predicated on the assumption that ACMA would i) proactively enforce the use of those channels exclusively for emergency communications and ii) improve the education and awareness of CB users on the use of these channels. Should this not occur, any continued allocation of specific CB channels for emergencies will prove meaningless.

Thank you for the opportunity to provide a submission on this topic.

Yours sincerely,
Rod Channon