



# ACREM

Australian Citizens Radio  
Emergency Monitors Inc.

*CB Radio Saves Lives - Help Us to Help You!*

**Our Ref:** N-100602-ACMA

**Your Ref:**

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To whom it may concern

## RE: CHANGES TO THE UHF CB BAND

Further to our lodged response to the paper "**The Way Ahead - Decisions and Implementation Options for the 400MHz Band**", we note comments from Andrew Stewart, Senior Engineer National Interest Planning Section, received by one of our members in response to his own enquiries concerning the final decision.

*In particular we note the comments "The ACMA is comfortable it has been diligent in its efforts to engage stakeholders in the review process (which has been in the public eye for at least two years), including writing to each licensee in the band. Peak bodies involved in UHF CB have been engaged in the review and the UHF CB community has had representation on the Radiocommunications Consultative Committee 400 MHz working group. In addition CB equipment manufacturers have been engaged in the process and have made significant contributions."*

From the responses to the discussion paper "**Spectrum Proposals: 403 - 520 MHz. Proposals for future arrangements in the 400 MHz band.**" we note that ourselves, CREST-Victoria and GME Electrophone, being the only 2 "user groups" that responded and one of the largest UHF CB manufacturers in Australia, all opposed the implementation of changes to the emergency channels or the use of "A" and "B" channels.

In their response CREST-Victoria stated "***Our main concern is, however, as an Emergency Monitoring Group that the Emergency UHF CB Channels remain as they are...***". Our own response stated "***The ACMA have proposed changes only to the simplex channels, keeping the repeaters and emergency channels unchanged in both frequency assignment and channel***

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**designation. We believe that this proposal satisfactorily resolves the issues we identified regarding possible changes to these channels, and presents a suitable alternative that will cause no concerns to CB monitoring groups"**. Clearly then the responses from the ONLY "CB user groups" to lodge a response indicated an objection to any change to the UHF CBRS emergency channels, 5 and 35.

Furthermore, the response from GME Electrophone stated "**From a sales and marketing perspective it is preferable to refer to the new channels as 'ch49' to 'ch61', 'ch62' and 'ch63' being reserved for telemetry, 'ch64' to 'ch69' and 'ch79' to 'ch80' in Phase1. This is in preference to '9a', '9b' (etc) which is viewed as potentially confusing to the users.**" Clearly this response from this major Australian manufacturer of UHF CB equipment does not support the ACMA proposed changes to the channel numbering.

In fact, GME Electrophone proposed an alternate channel plan that was very similar to that proposed by ACREM, and that ACREM agrees would be a much better option than that put forward by ACMA in its final decision. The alternate plan, shown in Attachment A, would preserve the existing channels 1 to 40, which would obviously retain the existing emergency channels as 5 and 35. The new 12.5kHz frequencies are then introduced in two phases:

1. Simplex Channels 49 to 69, and 79 to 80, bringing the band to 63 channels.
2. Repeater pair Channels 41 to 48 and 71 to 78, plus channel 70, bringing the band to 80 channels.

The alternate channel plan proposed by GME addressed a number of issues, including compatibility with existing UHF CB equipment, ease of implementation by manufacturers, retention of emergency channel numbering, and ease of re-education of existing users regarding new channels. On the other hand the ACMA proposed channel plan is NOT compatible with existing UHF CB equipment, will NOT be easy for manufacturers to implement with existing designs, does NOT retain well established and well known emergency channel allocations, and will NOT be easy to convey to existing users.

In their submission GME also stated "**To minimise the overall interference in the UHF CB band, it is preferable to have an explicit provision for sale and use of existing 40ch equipment with reduced deviation. In this way there would be a 'zero cost' penalty for this type of equipment, so the uptake of the low interference potential 2.5kHz deviation will be encouraged, rather than further delayed by relying on grandfathering arrangements and feeding the market with more 5kHz deviation equipment after the announcement of Phase1"**. This seems a most sensible concept that will only work if the existing channels 1 to 40 retain their current frequency assignments, with the new frequencies starting from channel 41. It would mean that many existing sets, perhaps owned by users that are not interested in the additional channels for whatever reason, could continue to be utilised after tuning to the new 2.5kHz deviation, rather than all of these sets becoming obsolete as would occur under the current ACMA proposed changes.

Other responses from individual users also supported the change to a full 80 channel band at 12.5kHz spacing for all channels, including the telemetry and data channels, but did not indicate that the proposed "A" and "B" channels would be preferred above any other option, so we have to wonder why this option has now become the preferred option.

If we consider the responses to the first paper then we have further evidence that ACMA have gone against the preferred options suggested by the band users and industry.

In response to the 2008 paper "**Spectrum Options: 403-520 MHz discussion paper"**, GME-Kingray (GME Electrophone) stated in their submission "**We therefore support the ACMA proposal for additional channels, and in particular the interleave method of channel allocation where channels 1 - 40 keep their current frequency assignment.**" This response would have meant that channels 5 and 35 would remain as they are currently, and the new 12.5kHz frequencies would be numbered from channel 41 to 80, as per the GME suggestion in their second response. Our own response, apparently the only response to this paper by a "UHF CB user group" (according to the response list on the ACMA website), opposed any changes that would change the existing emergency channels 5 and 35.

Given the fact that the two "user groups" that have lodged responses to the last discussion paper both opposed any changes to the emergency channel numbers of 5 and 35, and the fact that a major Australian owned manufacturer has proposed a preferred channel plan that would also address this issue with the emergency channels, ACREM would urge the ACMA to reassess its decision regarding the UHF CB band changes and would urge the ACMA to adopt the alternate plan proposed by GME Electrophone, and presented here in **Attachment A** for your convenience.

In addition, we believe several "user groups" have or will lodge their objections to the proposed "A" and "B" channels, including ACBRO and GME Electrophone. Included with this correspondence is a letter from the organisation "**South East Queensland UHF Emergency Service Team**" or "**SEQUEST**", detailing their own objections to the proposed channel structure. We present this letter as further evidence that the ACMA proposal is not supported by the UHF CB users and in fact promises to be confusing and potentially life threatening.

We would have to question any changes to the contrary imposed by the ACMA given the fact that submissions by the band users would not seem to support the ACMA's currently proposed changes.

We would also hope that the Honourable the Senator Stephen Conroy, Minister for Broadband, Communications and the Digital Economy, and the Australian Government, would also question the true motives behind any changes that have been so strongly opposed not only by users of the affected band, but also by a major Australian owned manufacturer who will obviously be adversely affected by the changes proposed by the ACMA in preference to suggestions that would have addressed the concerns raised and made the implementation of changes much easier and simpler.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Howells', written in a cursive style.

Rev. Martin Howells (VK2QH)  
**NATIONAL DIRECTOR**

Cc: The Honourable the Senator Stephen Conroy, Minister for Broadband, Communications & the Digital Economy

# ATTACHMENT A

Proposed Alternate UHF CB Channel Plan (refer GME Electrophone submission)

<i>Chnl</i>	<i>Freq</i>	<i>Use</i>	<i>Chnl</i>	<i>Freq</i>	<i>Use</i>
1	476.4250	Repeater output			
			41	476.4375	Repeater output
2	476.4500	Repeater output			
			42	476.4625	Repeater output
3	476.4750	Repeater output			
			43	476.4875	Repeater output
4	476.5000	Repeater output			
			44	476.5125	Repeater output
5	476.5250	EMERGENCY			
			45	476.5375	Repeater output
6	476.5500	Repeater output			
			46	476.5625	Repeater output
7	476.5750	Repeater output			
			47	476.5875	Repeater output
8	476.6000	Repeater output			
			48	476.6125	Repeater output
9	476.6250				
			49	476.6375	
10	476.6500				
			50	476.6625	
11	476.6750	Call			
			51	476.6875	
12	476.7000				
			52	476.7125	
13	476.7250				
			53	476.7375	
14	476.7500				
			54	476.7625	
15	476.7750				
			55	476.7875	
16	476.8000				
			56	476.8125	
17	476.8250				
			57	476.8375	
18	476.8500				
			58	476.8625	
19	476.8750				
			59	476.8875	
20	476.9000				
			60	476.9125	
21	476.9250				
			61	476.9375	
22	476.9500	Data			

			62	476.9625	Data
23	476.9750	Data			
			63	476.9875	Data
24	477.0000				
			64	477.0125	
25	477.0250				
			65	477.0375	
26	477.0500				
			66	477.0625	
27	477.0750				
			67	477.0875	
28	477.1000				
			68	477.1125	
29	477.1250				
			69	477.1375	
30	477.1500				
			70	477.1625	
31	477.1750	Repeater input			
			71	477.1875	Repeater input
32	477.2000	Repeater input			
			72	477.2125	Repeater input
33	477.2250	Repeater input			
			73	477.2375	Repeater input
34	477.2500	Repeater input			
			74	477.2625	Repeater input
35	477.2750	EMERGENCY			
			75	477.2875	Repeater input
36	477.3000	Repeater input			
			76	477.3125	Repeater input
37	477.3250	Repeater input			
			77	477.3375	Repeater input
38	477.3500	Repeater input			
			78	477.3625	Repeater input
39	477.3750				
			79	477.3875	
40	477.4000	Road			
			80	477.4125	

KEY:

Existing Channels

Phase 1 new channels

Phase 2 new channels