



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

24th April 2024

RE: Five-year spectrum outlook 2024–29 and 2024–25 work program - Draft for consultation

In response to the ACMA FYSO draft for consultation, GME would like to consult with ACMA on three items.

Firstly, in reference to Table 9: Consultation plans for 2024-2025 item Sunsetting of the Radiocommunications (Citizen Band Radio Stations) Class Licence 2015, GME would like to propose some minor changes to the CBRS class licence and associated standards. These are:

- a) GME suggests proceeding further with the transition to 12.5kHz channels. Initially it was proposed that 25kHz equipment would be allowed to operate for a further 5 years, but this change was never implemented. Since 25kHz UHF CB radios have not been available for sale for over 10 years, the UHF telemetry channels 22 and 23 could now be designated as narrow band 12.5kHz channels, enabling the allocation of channels 61, 62 and 63 as narrowband data channels to accommodate greater data usage for modern applications.
- b) GME suggests modernisation of the CBRS class licence as it relates to transmission of signals that indicate a CB station's geographic location. This has now become a very popular feature in some radios. However, GME suggests that the specific limitation of location data duty cycle to 10 seconds in any period of 60 minutes is too punitive and negatively impacts the radio users that wish to share their location. GME suggest that the limitation is removed in the case when the CB station transmits location signals as a data burst appended at the end of a voice transmission. Instead, the location data burst length at the end of a voice transmission should be limited to 400ms, without any other long-term limits on the duty cycle. In comparison, a transmitter release tone ("roger beep") is currently allowed in AS/NZS 4365, also without any limits on the long-term duty cycle. GME suggests this update in light of users' complaints about insufficient location updates caused by the existing duty cycle limit, and GME's implementation of the short location data burst being non-intrusive and barely perceptible to the users.
- c) GME would like to consult on the transition of CBRS repeaters to 12.5kHz channels, recognising that a significant proportion of existing CBRS repeater infrastructure operates at wideband, so the impact on stakeholders should be carefully considered.

The second item on which GME would like to consult are the potential changes to maritime regulatory arrangements regarding the use of LMR terminals on maritime VHF channels. GME would like to understand the implications for users of VHF LMR and maritime radio.

The final item on which GME would like to engage with ACMA is the potential re-allocation of the 600MHz (617-698MHz) band currently allocated for broadcast television. GME watches with interest any changes that will impact television receiver equipment.

In pursuing these suggested changes, GME will keenly liaise and collaborate not just with ACMA, but also with Standards Australia, and the industry, as required.

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