



## **Proposed amendments to the Radiocommunications (Citizen Band Radio Stations) Class Licence 2015**

### **Australian Trucking Association Submission 9 March 2017**

#### **1. About the Australian Trucking Association**

The Australian Trucking Association (ATA) is the peak body representing trucking operators. Its members include state and sector associations, some of Australia's major logistics companies and businesses with leading expertise in truck technology. Through its members, the ATA represents many thousands of trucking businesses, ranging from owner drivers to large fleets.

#### **2. Summary**

In 2011 limitations to the use of citizen band radio stations (CBRS) were introduced by the Australian Communications and Media Authority (ACMA) to reduce congestion and a perceived risk of interference from interlinking.

The ACMA have now launched a public consultation process on effectively reversing these limitations. Specifically, the changes proposed by the ACMA consultation paper are;

- removing the 30 June 2017 time limit on the use of 25 kHz CBRS equipment, and
- removing the limitation on the use of CB stations to link CB channels and CB repeaters.

#### **3. Issues & ATA recommendations**

The ACMA consultation paper indicates that monitoring shows that congestion has since been reduced following the 2011 changes, and will continue to do so as the equipment is progressively replaced by the 12.5 kHz equipment mandated in the current technical standard.

In light of these findings the ATA is in agreement with the ACMA proposed amendments. As the congestion issue is no longer present, and the current technical standard for new equipment will continue to see this situation improve, it would be an unnecessary cost burden on affected trucking operators to replace affected equipment before the end of its useful life.

The trucking industry consists almost entirely of small businesses, and is characterised by tight margins. Research by the ANZ shows that the median EBIT margin for trucking businesses was 4.2 per cent in 2015. The bottom quartile of trucking businesses recorded negative, unsustainable EBIT margins.<sup>1</sup> The imposition of an additional cost burden by requiring the purchase of new equipment before it would otherwise be necessary is not sustainable for businesses who are already struggling with negative margins.

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<sup>1</sup> Suffield T. "Road transport performance from a bank's perspective." Presentation at Trucking Australia 2016, 24 June 2016.



Additionally, in early 2017 the ATA received feedback from trucking operators who had been unaware of the time limit on the use of 25 kHz CBRS equipment and how this might impact them from 1 July 2017. If the time limit is not removed, the ATA would have concern that trucking operators may end up in breach of the limitation for no other reason than not being aware of the changes. Changes that impact on industry should be well communicated, and with a clear lead in time.

**Recommendation 1**

The ACMA should proceed with the proposed amendment to remove the 30 June 2017 time limit on the use of 25 kHz CBRS equipment.

**Recommendation 2**

The ACMA should proceed with the proposed amendment to remove the limitation on the use of CB stations to link CB channels and CB repeaters.

**Recommendation 3**

The final decision on the proposed amendments by the ACMA should be made by the end of March 2017, and then clearly communicated to industry to establish policy certainty in the lead up to 30 June 2017.