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Sent: September-06-17 9:41 AM
To: Spectrum Engineering / Genie du spectre (IC)
Subject: Canada Gazette Notice SMSE-005-17

Department of Innovation, Science and Economic Development
Spectrum Engineering
Engineering, Planning and Standards Branch
Ottawa ON

Gentlemen,

The following comments upon Canada Gazette Notice SMSE-005-17.

By way of introduction I am a radio amateur, currently holding amateur callsigns VE2QNN and VE3QN, and have held an amateur radio Certificate of Proficiency since 1959.

In the Gazette Notice the Department proposes to make available to Canadian amateurs the frequency segment 5351.5 to 5 366.5 kHz which was approved at the 2015 World Radiocommunication Conference.

The Department also proposes to retain in the Canadian Table of Frequency Allocations the five specific frequencies in the 5 MHz range which were first authorized to Canadian amateurs in 2014.

As an active radio amateur I welcome both of these initiatives.

I wish, however, to draw to the Department's attention the apparent contradiction in the proposed power limitations. The 2014 allocation of the specific frequencies authorized a maximum power of 100 watts Effective Radiated Power (ERP). Included in this power limitation specifically is the frequency 5 358.5 kHz.

The proposal for the 15 kHz segment beginning at 5 351.5 kHz, however, proposes a power limitation of 15 watts effective isotropic radiated power (eirp).

Since there have not been, to my knowledge, any complaints of interference from amateurs operating with the 100W ERP limitation it would seem unnecessary to impose a limitation of 15 watts eirp for the new segment.

Therefore, I would respectfully propose that the Department amend the proposed changes to the Canadian Table of Frequency Allocations so as to set the power limitation in the segment 5 351.5 to 5 366.5 kHz at 100 watts ERP. As I understand it, the Department could make such an exception from the International Table of Frequency Allocations under the same authority by which the aforementioned five specific frequencies were authorized in 2014.

Thank you for your consideration.

Bryan H. Rawlings
