

October 20, 2017

Mr. Martin Proulx
Director General
Engineering, Planning and Standards Branch
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Innovation, Science and Economic Development Canada
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Submitted by email: ic.spectrumengineering-genieduspectre.ic@canada.ca

Re: SMSE-005-17 – Proposed Revisions to the Canadian Table of Frequency Allocations

The Board is pleased to respond to the above noted consultation. The response was developed by members of all four of the RABC Standing Committees, under the leadership of the Chair of the RABC Fixed Wireless Communications Committee. The consultation had broad interest amongst RABC members, with approximately twenty stakeholder participants actively involved in developing the response.

The RABC agrees that the proposed modifications to the Canadian Table accurately take into account the results of the 2015 World Radiocommunication Conference. The Board offers the following two proposals to clarify the Canadian Table.

1) Footnote CXYZ

Since the footnote itself only applies to 2 of the 3 boxes on page 21, in order to avoid any confusion, the Board proposes the footnote be written as follows [proposed change in red]:

CXYZ (CAN-15) In Canada, within the frequency ranges **470-608 MHz and 614-698 MHz**, the frequency band 614-698 MHz is identified for International Mobile Telecommunications (IMT).

2) Footnote C21

The RABC proposes modifying Canadian footnote C21 to increase the effective radiated power (ERP) to 100 W Peak Envelop Power (PEP) from 15 W e.i.r.p. as currently proposed in the Radio Regulation under No 5.133B for 5 351.5-5 366.5 KHz. The proposed modification is underlined in the text below:

MOD

C21 (CAN-14) Amateur service operators may transmit on the following five centre frequencies: 5 332 kHz, 5 348 kHz, 5 358.5 kHz, 5 373 kHz, and 5 405 kHz. Amateur stations are allowed to operate with a maximum effective radiated power of 100 W PEP and are restricted to the following emission modes and designators: telephony (2K80J3E), data (2K80J2D), RTTY (60H0J2B) and CW (150HA1A). Transmissions may not occupy more than 2.8 kHz centered on these five frequencies. Amateur radio service operators may transmit in the frequency band 5 351.5-5 366.5 kHz with a maximum effective radiated power of 100 W PEP. Such use is not in accordance with international frequency allocations. Canadian amateur operations shall not cause interference to fixed and mobile operations in Canada or in other countries and, if such interference occurs, the amateur service may be required to cease operations. The amateur service in Canada may not claim protection from interference by the fixed and mobile operations of other countries.

This response was sent to RABC Sponsor Members for ballot. Thirteen of the RABC's twenty-one Sponsor Members responded as follows: 10 approved (Bell, CAB, CanWISP, CBC/Radio Canada, CECA, MAAC, Radio Amateurs of Canada, RCMP, Rogers and TELUS); 1 approved with comment (Department of Defence), and 2 abstained (Canadian Association of Broadcast Consultants and NavCanada).

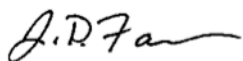
The Sponsor Members' comments (which form an integral part of the RABC's response) are as follows:

Department of Defence

DND is comfortable with the change to the output power for the 5 HF spot frequencies proposed for Footnote C21.

The Board appreciates the opportunity to respond to this important notice.

Sincerely,



J. David Farnes
General Manager