



September 26th, 2013

Director General Engineering, Planning and Standards Branch
Industry Canada
235 Queen Street
JETN, Room 1943B
Ottawa, Ontario, K1A 0H5

Dear Sir

The Quarter Century Wireless Association (QCWA) is an International society of the senior radio amateurs. This is written on behalf of the 80 members of the Ottawa Chapter 70, many of which had professional careers in radio and telecommunications.

We are pleased with the opportunity to the consultation concerning the Proposed Revisions to the Canadian Table of Frequency Allocations, Canada Gazette Notice SMSE-004-13

Specifically, we wish thank the Department for including the new amateur service allocation of 472 to 479 kHz in the proposed revisions to the Canadian Table. We wish also to thank the Department for the support in obtaining this allocation internationally as an outcome to WRC 12 in which two of our local QCWA members were involved in the ITU proceedings.

QCWA Chapter 70 fully supports the inclusion of this secondary MF allocation to the amateur service for Canada. This band will offer a new horizon for studies into local and distant propagation in this unique spectrum space using narrow band modulation techniques. Some of our members are anxious to try it out.

There may be opposition from the power utility sector claiming the use of this spectrum could pose a risk of interference to the use of Power Line Carrier technology on the power grid. We believe this as being very unlikely. There will be very slow and limited take-up by Canadian amateurs using this band since the allocation is new and as yet, there is no commercial equipment available. Indeed, the low power restriction of 5 watts EIRP and low efficiency of practical antennas at this wave length will result in any signals induced into power lines will be slight and very much reduced from other sources of interference. And, as a matter of practical consideration, this band will never be used for amateur terrestrial mobile applications where there could be chance of operation directly under power lines carrying PLC signaling. Also, we believe the power utilities are engaged in an active program to replace what PLC technology that may still be used with far more robust and reliable IP packet telecommunications based on fiber-optic connectivity.

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We trust our comments are constructive and will lead to the 472-479 kHz allocation being established as domestic amateur service allocation in Canada based on the terms in the Proposed Revision to the Canadian Table of Frequency Allocations. We expect also this allocation will be included in revisions to the frequency schedule of amateur service allocations in RBR-4, "Standards for the Operation of Radio Stations in the Amateur Radio Service".

On behalf of the membership of QCWA, Chapter 70, Ottawa, Ontario;

Yours sincerely,

Dr. David Conn, VE3KL
President, QCWA, Chapter 70
Ottawa, Ontario