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Radio Advisory Board of Canada **Conseil consultatif canadien de la radio**

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By email at: Spectrum.Engineering@ic.gc.ca

Subject: **Canada Gazette Notice No. SMSE-004-13 — Consultation on Proposed Revisions to the Canadian Table of Frequency Allocations**

The Radio Advisory Board of Canada is pleased to respond Canada Gazette Notice No. SMSE-004-13 — Consultation on Proposed Revisions to the Canadian Table of Frequency Allocations.

The Board has undertaken a review of proposed changes to the Canadian Table of Frequency Allocations through a joint working group chaired by Andrew McGregor.

We note in particular that the proposed changes include decisions made by the ITU World Radio Conference (WRC) in 2012 for Region 2 as well as changes to domestic allocations promulgated in various spectrum documents since the last revision of the Canadian Table.

The Board agrees with the changes proposed.

This response was balloted to Board members. Eleven of the RABC's 20 members responded as follows: 9 approved, 2 approved with comments, 0 abstentions and 0 disapproved.

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

Comments of the Radio Amateurs of Canada

"Radio Amateurs of Canada is pleased to see the new amateur secondary service allocation, 472 to 479 KHz added to the Domestic Table as an outcome of WRC 12, agenda item 1.23. We expect this allocation along with other previous updates to the CTFA concerning the amateur service will be made to RBR-4 as soon as possible."

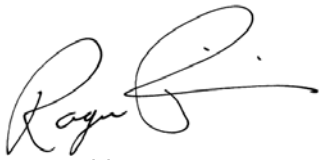
Comments of UTC Canada

"Utilities use the 472-479 kHz band to support power line carrier systems, which are essential to the protection of the electric transmission grid from faults that could otherwise cause massive power outages. These systems are designed to operate within 20 milliseconds or less in order to isolate the fault from cascading on the transmission line. Utilities are concerned that a secondary

allocation for amateur operations in the 472-479 kHz band poses the potential for interference to and from PLC systems that are located within proximity to an amateur station using that frequency band. This could cause PLC systems to trip when they shouldn't or fail to trip when they should. Conversely, PLC systems could cause interference to amateur operations in the band.

PLC systems operate on an unlicensed basis and would be required to protect the secondary amateur station or shut down altogether, if they cause interference to the amateur station. Under either scenario (i.e. interference to or from PLC systems) the presence of amateur operations would likely have the practical effect of precluding utilities from operating in those bands. Retuning the PLC systems is no easy matter and the cost can be significant. It not only requires the retuning of the system that is in proximity with the amateur station, but also the retuning of other PLC devices up and down the line. Moreover, in some areas, finding available frequencies is difficult. So, even if the utility wanted to retune, it may not be technically feasible to do so. Several Canadian utilities have reported that they use the 472-479 kHz and one in particular has reported that it uses the band for an international interconnection with the U.S. Again, the complexity of retuning this system will be even greater, considering the difficulty of agreeing with U.S. authorities to find an alternative set of frequencies to use across the border. "

Yours truly,



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