

VIA FAX: 954-6091

January 20, 1999

Mr. R.W. McCaughern
Director General
Spectrum Engineering Branch
Industry Canada
300 Slater Street, 19th Floor
Ottawa, Ontario
K1A 0C8

Dear Mr. McCaughern:

Re: Canada Gazette Notice SMBR-004-98, 1998-11-21; Allotment Plan for
Digital Radio Broadcasting (DRB), Issue 2.

In accordance with the above Canada Gazette notice, the CAB hereby submits its comments relating to the new DRB Allotment Plan for Canada.

If you or your officials have any questions about the CAB's comments, please direct them to our Technical Advisor, Wayne Stacey of Stacey, Lawson Associates Ltd at (613) 830-6985.

Sincerely,

Jill Birch
Vice-President, Radio

Attachment

Industry Canada Notice SMBR-004-98;
Canada Gazette, November 21, 1998

Allotment Plan

For

Digital Radio Broadcasting (DRB) Issue 2

Prepared by:



January 20, 1999

1. The Canadian Association of Broadcasters (CAB), as representative of the vast majority of Canadian programming services - including private television and radio stations, networks, and specialty services - is pleased to submit its comments relating to the new DRB Allotment Plan for Canada.
2. The CAB has an interest in the issues raised in Notice SMBR-004-98 because its radio members will constitute the largest number of actual users of the channels that are contained in the new Allotment Plan for Digital Radio Broadcasting (the Plan). Since 1994, the CAB has participated in Canada's allotment planning for digital radio (DAB) services, through its involvement in the Joint Technical Committee on Advanced Broadcasting (JTCAB).
3. One of the main reasons for up-dating the original 1995 Allotment Plan (Issue 1) was that Industry Canada has negotiated an agreement with the FCC whereby the United States will ensure that Canadian terrestrial DAB services, licensed in conformity with the agreement, will be protected against interference from US licensees of non-broadcasting services. Moreover, the agreement ensures that Canada will not have to undertake separate co-ordinations for each and every L-Band DAB assignment made in Canada in the future. Reaching this agreement with the US marks a significant milestone in the implementation of L-Band DAB services Canada and the CAB applauds the efforts of Industry Canada in achieving this goal.
4. One of the key provisions of the Canada-US Agreement is that broadcast use of DAB channels 18-23 outside the Windsor-Quebec City corridor will not be protected against potential interference from Mobile Aeronautical Telemetry Services (MATS) operating in the US. Issue 2 of the Plan takes this into account and the number of allotments in this sub-band in areas outside the corridor has been reduced to only a few.
5. Nevertheless, since the unprotected use of Channels 18-23 in "non-corridor" areas may be acceptable to certain types of licensees, the CAB asks that Industry Canada remain open to the notion of conditional licensing of drop-in assignments in this sub-band if and when requested by applicants.
6. The CAB also notes that the Department has identified the need for a co-ordination procedure that will deal with situations where DAB assignments at the two extremes of the 1452-1492 MHz band could affect Fixed Service users operating in the upper and lower adjacent bands.
7. The CAB understands that any negative impact of DAB assignments is most likely to be felt by Subscriber Radio (SR) systems. The problem, as identified in investigations undertaken by the Communications Research Centre (CRC), has to do with the fact that the receivers used by SR licensees have limited selectivity. This means that they are prone to receiving unwanted signals from adjacent-band DAB services, even if the DAB emissions are confined to the mandatory spectrum mask defined in *Broadcast Procedures and Rules, Part V*.

8. DAB broadcasters would be concerned if their operations were constrained in the long term, simply because the prevailing design characteristics of SR receivers are not suited for use in situations where higher-power transmitters may occupy an adjacent band. While suitable co-ordination procedures may be developed and implemented in the near-term, the long-term objective of the Department should be to seek improvements in the overall selectivity of SR receivers, so as not to constrain broadcast use in the 1452-1492 MHz band. In the meantime, the CAB stands ready to work within the appropriate government/industry consultative group(s) to develop co-ordination criteria that will address the immediate problem.
9. The published version of Issue 2 of the Plan includes Annex 1, ***Group and Call Signs Listing***. The CAB notes the Department's comment, "This list is intended for information only and will not be published in the final version of the plan". It also says in the same section, "Industry Canada has no objection to regrouping provided that the integrity of the Plan ... is not compromised. Accordingly, any changes in the groupings may be addressed at the time of the licensing process".
10. So far, DAB licensing has occurred in Toronto, Montreal and Vancouver. In all three cities, it has been necessary for the applicants to seek grouping arrangements that are substantially different from those detailed in Annex 1. Moreover, Annex 1 is simply a snap-shot view of the radio services that were licensed or approved in each market as of August 31, 1998. Due to the rapid changes occurring in the radio industry, many groupings can no longer be considered current, even though less than 6 months has passed since Annex 1 was prepared.
11. The CAB therefore strongly supports the proposal that, immediately following completion of the present gazetting process, the Plan should be re-published, including only the ***Table of DRB Allotments*** and any changes considered necessary as a result of public comments. Annex 1 should be dropped from this "final" issue.
12. Furthermore, assuming this happens, the CAB does not see why changes in the groupings that are listed in the current Annex 1 might have to be discussed as part of future licensing processes. If Annex 1 is not an integral part of the Plan, then there should be no need to make reference to it at all in any future licensing proceedings. While opinions may be registered during regulatory proceedings about the specific usage of allotments by applicants, conformity to Annex 1 (or lack of it) should not be an issue. In any event, as time passes and more licensing changes are made, the present Annex 1 groupings will become even less relevant.
13. To be most useful to the industry and the public, future hard-copy and electronic issues of the Plan should show any assignments that have been made on allotted channels. This might be achieved by adding five fields to each record in the ***Table of DRB Allotments***, showing the call sign of each broadcaster that may be assigned to use the channel.

14. To conclude, the CAB's radio members are very pleased that a complete allotment plan for DAB is now in place in Canada and that the uncertainties associated with coordinating the use of the 1452-1492 MHz band in border areas have largely been resolved with the USA. While work must continue with respect to developing inter-service coordination procedures in Canada, this does not appear to present significant difficulties at this time. As the roll-out of DAB proceeds in Canada, the CAB expects that adjustments to the Plan will be necessary and that broadcasters will continue to work closely with the Department in this regard.
15. All of which is hereby respectfully submitted this 20th day of January 1999.