

January 20, 1999

Dr. Robert W. McCaughern  
Director-General, Spectrum Engineering  
Industry Canada  
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Ottawa, ON  
K1A 0C8  
Fax: (613) 954-6091

Re: **Gazette Notice: SMBR-004-98**  
**Allotment Plan for Digital Radio Broadcasting, Issue 2**

Dear Dr Caughern:

The Canadian Broadcasting Corporation (CBC) is pleased to have the opportunity afforded by the Gazette Notice to comment on this second issue of the Allotment Plan for Digital Radio Broadcasting (DRB Plan). First of all, the CBC would like to congratulate Industry Canada for completing the negotiations with the United States for the coordination of the use of the 1452-1492 MHz spectrum band for DRB. This agreement will certainly contribute to rapidly increasing the availability of Digital Radio services for Canadians.

The CBC is also pleased to see that its technical requirements to meet its national mandate have been successfully addressed in this new issue of the DRB Plan. This will allow the CBC to deploy Digital Radio in a comprehensive and spectrum efficient manner throughout Canada.

We note that Industry Canada does not intend, in future releases of the DRB Plan, to publish the list of AM and FM groupings. As agreed, it is understood that CBC's choices of groupings (or Digital Service Areas (DSAs)) will be identified in future releases of the DRB Allotment Plan. We would also like to suggest that future releases of the DRB Plan include both the lists of allotments and assignments, as is the current practice, with other broadcast services plans.

As you are aware, CBC's Corporate Engineering has participated fully in the development of Issue 2 of the Allotment Plan for Digital Radio Broadcasting and, in this respect only, have the above comments to submit. However, due to the limited delay offered for comments in the Gazette Notice, we have not been able to fully complete our internal briefings with other departments involved. In that regard, the CBC may submit complementary comments at a later date during the month of February.

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Finally, the CBC would like express its appreciation to Industry Canada for its continued efforts in assisting Canadian broadcasters in the development of this new service for the benefit of all Canadians.

Yours truly,

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SL/mr