

November 10, 2009 (by email)

Director General
Telecommunications Policy Branch
Industry Canada
16th Floor, 300 Slater Street
Ottawa, Ontario, K1A 0C8

**Subject: Canada Gazette, Part I, September 12 2009, Notice No. DGTP-011-09
Consultation Paper on Low-power Licensed Radiocommunication Devices, Including Wireless
Microphones, in the Band 698-806 MHz**

Mrs. Director General:

CBC/Radio-Canada would like to use the opportunity offered by the Department to comment on the gazette notice DGTP-011-09 "Consultation Paper on Low-power Licensed Radiocommunication Devices, Including Wireless Microphones, in the Band 698-806 MHz".

CBC/Radio-Canada currently utilizes low-power radiocommunication devices, which transmit and receive in the band 698-806Mhz. These devices are primarily used to produce and present broadcast elements both at temporary outside locations or semi-permanent inside studio locations.

CBC/Radio-Canada agrees with proposal 1,3 and 4 of the consultation paper.

Proposal 2, if enforced as it is currently proposed, poses some major concerns for CBC/Radio-Canada operations. Should this proposed change take affect on march 31st 2011, we would be required to replace or make system modifications for these devices over a very short span of time. Both the inconvenience and significant expense (\pm \$1.5M) of replacing or modifying these items would directly hamper our ability to produce content for our many media platforms.

To minimize the impacts on CBC/Radio-Canada, the transition period should be extended well beyond 2011. The Department should consider a more flexible approach, than a firm date for the whole band. The low-power radiocommunication devices already in use could cease operation only when the new systems are ready to start operating. This approach would leave CBC/Radio-Canada the most time possible to transition its systems.

Another solution that CBC/Radio-Canada would like to propose is the confined use of low-power radiocommunication devices. Given the power involved, operation of the low-power radiocommunication devices within an enclosed area, like an underground studio, would not create interference to other systems. An exception allowing such use of low-power radiocommunication devices would certainly help CBC/Radio-Canada in optimizing the use of costly equipment.

Respectfully,

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