



CBCEARS

Canadian Broadcasting Corporation
Employee's Amateur Radio Society
c/o Alan MacMillan, 2375 West 20th Ave.,
Vancouver, British Columbia, V6L 1G4
Canada

VE7NY / VE7APM
C/O Alan MacMillan
604-738-7666
amacmill@shaw.ca

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Director General, Spectrum Engineering Branch
Industry Canada,
300 Slater Street,
Ottawa, ON K1A 0C8

Subject: Response to Canada Gazette Notice SMSE-005-05 dated July 19, 2005 Consultation Paper on Broadband over Power Line (BPL) Communications Systems

Dear Sir:

The Canadian Broadcasting Corporation Employees Amateur Radio Society (CBCEARS) wishes to comment on the document referred to above. Industry Canada's decisions on the matter of BPL can have a severe impact on the ability of licensed and authorized radio users to receive and communicate on MF, HF and VHF spectrum, and in particular, on the future of the Amateur Radio Service.

CBCEARS represents 13 licensed amateur radio operators in the Lower Mainland of British Columbia who are involved in radio communications for personal enjoyment, as well as for the benefit of our community, and in particular to provide communications during local, national and international emergencies where other communications means have failed.

Having reviewed your Paper and other available literature on the subject, we believe that the introduction of BPL with the proposed emission limits, will create harmful interference to authorized and legitimate uses of the radio spectrum. In its current state of development, wide-area BPL could have a devastating effect on radio users in the range 2 MHz to 80 MHz and beyond, and deprive them of a legitimate use of this spectrum.

RESPONSE

The following sections follow the numbering in Canada Gazette notice SMSE-005-05:

3.2.1 Access BPL

We see a misuse of the word unintentional radiator in paragraph 5. We believe that if you know that it is going to occur then it can't be unintentional. A more appropriate word would be superfluous.

3.3 In House BPL

We see a misuse of the word unintentional radiator in paragraph 6 again.

6.1 Equipment Standard and Approval Process

We feel that the certification process must be used for all BPL equipment deployed.

6.2 (a) Emission Limits

We feel that the emission limits should be written in a language that supports the equipment available in an average amateur HF station. i.e. What is the S meter reading on a simple dipole thirty meters from the power line.

6.2 (b).1

We also feel that if the equipment is expected to radiate inside our band allocations that it should incorporate not only the three suggested methods of adaptive interference mitigation, but also add identification techniques that will inform the amateur radio operator using his regular receiver in a standard mode, of the offending equipment ownership and location. (i.e. cw identification at the top of the hour)

6.3 (a).1 We feel that the BPL signals should be notched from all Ham Bands to preserve this resource for use in public safety related service during disasters, natural or man made. If the equipment signals are eliminated from these bands in the planning and installation, then when the disasters occur and BPL equipment is disrupted by: failed lines, shorted lines, crossed lines, downed poles, ice loads, etc. then when this disaster needs communication resources there will not be radiation to kill this response by the amateur community.

6.3 (a).3 GPS signals,

6.3 (b).(1) Banned in high density population areas, i.e. cities.

6.3 (b).(3) We feel that the equipment should incorporate identification techniques that will inform the amateur radio operator using his regular receiver in a standard mode, of the offending equipment ownership and location. (i.e. cw identification at the top of the hour).

6.3 (c) We feel that identification is the key. Who is the operator of the equipment, which piece of gear is interfering, if the amateur can identify the offender using his normal gear, then the departments suggestions for interfering resolution will be effective.

Submitted by: CBCEARS, Alan MacMillan VE7NY/APM along with the executive of the club.