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November 25, 2005

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:

I wish to comment on the document referred to above. Industry Canada's decisions on the matter of BPL can have a severe impact on the Amateur Radio Service utilized in disaster response.

As the Emergency Planner responsible for Emergency Social Services for the City of Vancouver, I feel it is important to convey my concerns regarding BPL Communications Systems. In the City of Vancouver, we have a team of volunteers who have committed to provide communications during local emergencies, where other communications means have failed. I would be very concerned if their ability to continue to provide this service is negatively impacted in any way.

Having reviewed your Paper and other available literature on the subject, I am concerned 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 – 80 MHz and beyond, and deprive them of a legitimate use of this spectrum.

In addition to providing communication assistance during emergency situations such as landslides, flooding, and fires, the amateur radio service is a significant resource to our city during major events, including Celebration of Light (Fireworks display), The Santa Claus Parade, Vancouver Marathon and the Grey Cup Parade to name just a few. These volunteers play a key role in keeping our citizens safe during good times and bad.

BPL systems, in their present form, have the capability of interfering with or totally preventing radio operations. I hope the Department is committed to preserve the ability of radio systems to continue operation. Amateur radio is a wonderful community resource, and should be protected. There are parts of the MF/HF/low VHF spectrum, such as 30 to 50 MHz, where BPL would least

affect users. I hope the Department judiciously chooses frequency bands to be excluded, and promote BPL in those segments least likely to be affected.

My understanding is that radio amateurs are not against BPL per se and recognize that BPL may benefit some Canadians. However, given the interference problems that have been experienced by radio amateurs in various countries to-date from BPL system radiation, radio amateurs and emergency planners hope that the Department will regulate BPL equipment and systems to minimize interference to all HF radio services from these unconventional, non-radio data and telecommunications systems.

Yours truly,

Janine Aussem
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Vancouver Board of Parks and Recreation