

# Marconi

RADIO CLUB OF  
NEWFOUNDLAND

Box 1033, Torbay, Newfoundland and Labrador  
Canada, A1K 1K8

30 August 2013

**To: Marc Duplis, Director General Engineering  
Planning and Standards Branch, Industry Canada  
(JETN, Room 1943B), Industry Canada, 235 Queen Street  
Ottawa, Ontario K1A 0H5**

**Re: Notice No. SMSE-004-13**

**Consultation on Proposed Revisions to the Canadian Table  
of Frequency Allocations**

**Canada Gazette, publication date 29 June 2013**

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Dear Sir,

The Marconi Radio Club of Newfoundland (MRCN) are grateful for the opportunity to comment on these proposed revisions. MRCN incorporated in 2001 to promote science, engineering and technology. From 2009-2012, we and other Canadian amateurs conducted experiments between 504 and 509 kHz in support of a domestic allocation to the Amateur Service in this portion of the radio spectrum. We have used Morse and digital transmissions on 504.1, 507.77 and 508.5 and were authorised to use up to 20 watts ERP. There were no reports of interference from these operations. These experiments yielded information that was used by the Radio Amateurs of Canada (RAC) to help secure the 472 to 479 kHz band at the 2012 World Radio Conference. Our findings were published on the internet and in the November-December 2011 issue of "The Canadian Amateur". We support the allocation of 472 to 479 kHz to the Amateur Service and look forward to resuming experimentation with Canadian and amateurs world-wide to establish high reliability communication systems on this band.

We wish to acknowledge the many amateurs, Jim Dean and the late K. Pulfer in particular, and clubs of Newfoundland and Labrador and worldwide who contributed to the success of our experiments.

Sincerely

J. Craig, Marconi Radio Club of Newfoundland