



# Radio Amateurs of/du Canada Inc.

*Member Society of the International Amateur Radio Union - Membre de l'Union Internationale des Radioamateurs*

September 19, 2013

Director General Engineering, Planning and Standards Branch  
Industry Canada  
235 Queen Street  
JETN, Room 1943B  
Ottawa, Ontario, K1A 0H5

Dear Sir.

**Canada Gazette Notice SMSE-004-13, Radio Amateurs of Canada Comments regarding Consultation on Proposed Revisions to the Canadian Table of Frequency Allocations.**

Radio Amateurs of Canada (RAC) is the National Organization representing the interests of the amateur radio community in Canada. RAC welcomes this opportunity to provide comments following the release of the Consultation on the Proposed Revisions to the Canadian Table of Frequency Allocations (CTFA).

**472 to 479 kHz, Page 23**

RAC is pleased to see the Department has included this allocation to the amateur service on a secondary basis in Canada consistent with outcome of Agenda Item 1.23 at the World Radio Conference, 2012. It is acknowledged that amateur service use of this new Medium Frequency band will be limited to 5 watts effective radiated power relative to an isotropic radiator. The addition of this unique spectrum space to the amateur service will give amateur radio operators in Canada an opportunity to participate with other amateur operators in conducting short and long range propagation studies using very narrowband digital techniques. Such communications will provide another path for emergency and disaster relief communications when necessary.

**5250 to 5450 kHz, Page 19 and Gazette Notice SMSE-010-12**

RAC is awaiting the decision from the Department concerning Gazette Notice SMSE-010-12 "Consultation on Changes to the Canadian Table of Frequency Allocations and to RBR-4 to Allow for Amateur Radio Service Use in the 5 MHz Band". Based on the posted comments, we expect a favourable decision to this consultation very soon and expect an appropriate "CXXX" footnote will be added to this portion of spectrum in the Table indicating the six spot frequency allocations authorized to the Canadian Amateur Service and any restrictions on use that may apply.

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## **RSS 244, Medical Devices sharing the Frequency Band 413 to 457 MHz**

RAC has noted the release this year of RSS 244, "Medical Devices Operating in the Band 413 – 457 MHz". Because this spectrum range involves the widely used 430 to 450 MHz secondary amateur service allocation, RAC wishes to comment by suggesting to the Department that an appropriate footnote be included in the Canadian Table of Frequency Allocations indicating the shared use of this range of spectrum by the Medical Devices described in RSS 244 (and for that matter in RSS 243). Such references would be consistent with the US Table of Frequency Allocations and would be another source of information to new and incumbent users of this range.

## **RBR-4, Regulation by Reference, "Standards for the Operation of the Radio Stations in the Amateur Radio Service.**

This Regulation document by the Department specifies the frequency allocations for the amateur service in Canada and is seriously out of date when compared to the changes in allocations used by the amateur service as reflected in the revisions to Canadian Table of Frequency Allocations over the last 10 years. As RBR-4 is a core document guiding radio amateur operations and the education of new candidates to the service, RAC expects the Department will address this lapse in updating this document by making it consistent, as soon as possible, with the existing and proposed changes to the Canadian Table as part of this Consultation.

On behalf of the Amateur Radio Service in Canada;

Yours sincerely,

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