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September 7, 2005

Mr. Larry Shaw
Director General Telecommunications Policy
Industry Canada,
300 Slater Street,
Ottawa, ON
K1A 0C8

**Subject: Radio Amateurs of Canada Response to Canada
Gazette Notice: DGTP-001-05 dated 14 May 2005
Consultation on a Renewed Spectrum Policy Framework for
Canada and Continued Advancements in Spectrum Management**

Dear Mr. Shaw:

Radio Amateurs of Canadian (RAC), the national organization representing some 50,000 licensed Canadian amateur radio operators, appreciates the opportunity to comment on this important document.

RAC was an active participant in the Radio Advisory Board of Canada (RABC) Joint Working Group responsible for replying to this Gazette notice. RAC agrees with and supports the RABC's comments that have been submitted for your consideration.

RAC considers that it must emphasize its concerns, as it did in replying to the 2002 Spectrum Framework consultation paper, that Industry Canada must not rely on "Economic Principles and Market Forces" as the sole factor in decisions on the allocation of spectrum to the Amateur Service. In RAC's opinion, the phrase "where such action will enhance the economic, social and cultural benefits for all Canadians" should be added to Core Objective #2 and Policy Guideline 4 in such a way that a real assessment must be completed before "Economic Principles and Market Forces" are applied in the allocation of spectrum to all services.

RAC, as a representative of non-commercial licensees, has no comment on the balance of the proposed Spectrum Policy Framework. RAC, however, does have some general concerns. These concerns are:

a) The increasing, extensive deployment of low-power license exempt devices, particularly in crowded urban areas, is inevitably raising the noise floor, leading to the need for

increased transmitter power to maintain adequate signal to noise ratio, thus adversely affecting spectrum sharing and efficiency;

b) The potential deployment in Canada of continuously-emitting, unintentional radiating devices, such as BPL systems, which internationally are increasingly being found to cause widespread interference to authorized and licensed radio services such as the Amateur Service; and

c) An apparent shift in emphasis within Industry Canada from its traditional activities of regulation and enforcement to that of facilitating spectrum access for new technologies. There are some non-market driven radio services such as the amateur service, radio astronomy service and earth exploration satellite service, whose contributions to scientific, security and emergency communications are well known. Many applications within these services require extremely sensitive receivers and a low noise floor, and as a result there will be instances where the lack of regulation and enforcement may not be good public policy. Some new technologies may cause more harm than good. Spectrum is a finite public resource and the public good must be assessed before allocating spectrum.

RAC's membership continues to grow and Radio Amateurs continue to be leaders in the development and implementation of new technologies and techniques. Examples are PSK31, a 31 cycle wide keyboard-to-keyboard digital mode, and the Internet Radio Linking Project (IRLP), a method of linking radio repeaters around the world using VOIP and developed by a group of Radio Amateurs in Victoria, BC. Canadian Radio Amateurs are contributing to the knowledge of Low-frequency (LF) propagation and recently have achieved transatlantic communication at 136 kHz using effective radiated powers of less than one watt. A Canadian Radio Amateur recently participated in a successful 47 GHz earth-moon-earth (moon-bounce) communication experiment with an amateur station in Siberia. RAC urges the Department to continue to reserve spectrum as an essential Canadian resource for experimentation and the advancement of science and the radio services.

RAC is pleased to have had the opportunity to participate in the review of Industry Canada's Spectrum Policy Framework, both directly and through the RABC. We look forward to continued cooperation and good relations with the Department.

Yours sincerely,

Earle W. Smith, VE6NM
President
Radio Amateurs of Canada.

