



September 21st, 2017

Director General
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
Ottawa, Ontario

Dear Sir

Subject: Canada Gazette Notice SMSE-005-17 -- Ottawa Valley Mobile Radio Club Inc,
Comments regarding the Proposed Revisions to the Canadian Table of Frequency Allocations

The Ottawa Valley Mobile Radio Club (OVMRC) is a thriving Amateur Radio organization serving the Amateur Radio community in the National Capital Region. We focus on training and mobile operations providing volunteer communications for disaster relief and public service events. Our Club conducts an Amateur Radio Course and qualification examinations that attracts approximately 40 candidates annually. This year, our Club is celebrating its 60th Anniversary of continuous service to the Ottawa area.

The OVMRC welcomes this opportunity to comment on the Proposed Revisions to the Canadian Table of Frequency Allocations on sections that specifically affect the Amateur Service. The membership of the OVMRC has been following with great interest the proceedings of the World Radio Conference 2015 especially as it relates to a new 5 MHz band allocation.

77.5 to 78 GHz

We are pleased to see the Amateur and Amateur – Satellite services retain Primary Status for this allocation and respect that it is now proposed that Primary Status be co-shared with the Radiolocation service for automotive high-resolution collision avoidance radar applications. Since Amateur Radio use of this spectrum is limited to occasional, highly directional, point-to-point experimental communications over high elevation radio paths, we believe there will be negligible interaction sharing this band with the short range, ground based radio location services proposed. Our Club has only one member with equipment capable of transmitting on this band; he uses it a couple of times a year attempting to set distance records for this band with similarly equipped fellows between mountain top locations.

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5275 to 5450 kHz

We are pleased to see the proposed revisions to the Table adding the 15 kHz allocation of 5351.5 to 5366.5 kHz to the amateur service while retaining the existing five spot frequency assignments at 5332.0, 5348.0, 5358.5, 5373.0 and 5405.0 kHz. We respect the existing 100 watt (e.r.p.) power restriction to the existing channels and recognize the 15 watts (e.i.r.p.) indicated for the new allocation as prescribed in footnote 5.133B. However, since the existing authorized spot frequency of 5358.5 kHz, governed by Canadian footnote C21, is in the middle of the new 15 kHz allocation governed by ITU footnote 5.133B, we believe this represents a conflict with respect to radiated power that must be resolved or clarified. Since most amateur radio transmitters that cover this frequency range transmit up to 100 watts RF output, it would seem reasonable that a power limitation of 100 watts (e.r.p.) be allowed for the entire new 15 kHz allocation consistent with the five existing spot frequencies for which, we believe, no co-channel interference with primary status users has been reported. This amount of power would also be consistent with other administrations already authorizing 100 watts or more for their domestic amateur service over this frequency range. Besides making it more manageable for amateur operators to adjust their equipment, it would permit this entire allocation to be used more effectively in support of public service and disaster relief communications using single side band voice communications.

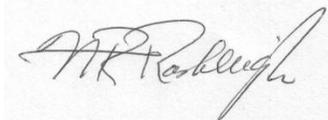
216 – 222 MHz

We appreciate and agree to the proposed Table revisions to delete the Amateur Service from the Table for the range 216 to 219 MHz to make it consistent with that given in RBR-4 (Standard for the Operation of Radio Stations in the Amateur Service) while maintaining the amateur service in the range 219 to 220 MHz and 220 to 222 MHz conditional on the provisions of Canadian footnote C11. We further understand this change will not affect the exclusive authorization of the amateur service in the adjacent frequency range of 222 to 225 MHz for which there is significant amateur communications activity.

We will look forward seeing these amateur allocation changes adopted in the revised Canadian Table of Frequency Allocations and being added to document RBR-4 as soon as possible.

On behalf of the members of the Ottawa Valley Mobile Radio Club;

Sincerely,

A handwritten signature in black ink, appearing to read 'Norm Rashleigh', is written over a light grey rectangular background.

Norm Rashleigh, VE3LC
President, Ottawa Valley Mobile Radio Club Inc.
P.O. Box 41145
Ottawa, ON K1G5K9