

To: Industry Canada, Spectrum Engineering

CC: Bill Glade VE4WO, RAC Regulatory Affairs Officer

2012 05 22

RE: 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.

I support your proposal in general, and I wish to offer the following comments on the five specific matters you wish to see addressed:

(1) Should Industry Canada allow amateur radio operators to use the five frequencies 5332 kHz, 5348 kHz, 5358.5 kHz, 5373 kHz and 5405 kHz, which are harmonized with U.S. amateur use, on a no-protection, no-interference basis? Transmissions would be restricted to a 2.8 kHz bandwidth centred on each of these frequencies.

My response: Yes.

(2) Should Industry Canada harmonize emission modes and designators with those specified in the United States for these five frequencies – i.e. telephony (2K80J3E), data (2K80J2D), RTTY (60H0J2B) and CW (150HA1A)?

My response: No. Industry Canada should not designate any particular transmission modes for these frequencies. Bandwidth specifications, as used in other Amateur allocations, should be the only restrictions.

(3) Should Industry Canada specify a maximum effective radiated power of 100W peak envelope power?

My response: No. IC should make no special power limitations for Amateurs using these frequencies. Proposed as a secondary service, Amateurs operating on these frequencies will have the same obligation not to cause harmful interference to primary service stations as we have on other bands where we are a secondary service. Amateurs have shown themselves to be responsible users of those bands, and I am confident we will be just as responsible on these frequencies.

(4) Should Industry Canada allow Canadian amateurs access to the 5329 kHz frequency for domestic communications only? Transmissions would be restricted to a 2.8 kHz bandwidth centred on this frequency.

My response: No. If Amateurs are permitted to transmit on 5329kHz, we should be permitted to communicate with any other Amateur station in any country.

(5) Should Industry Canada specify emission designators and peak envelope power for this additional frequency? If so, what should these be?

My response: No and no. Emission bandwidth specifications are sufficient to direct Amateur activity, and the obligation not to cause interference to primary services does not inhibit Amateur power levels on any other band where we are a secondary service.

Thank you for your proposal.

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