Marconi
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28 May 2012

To: Director General Engineering
Planning and Standards Branch, Industry Canada
300 Slater Street 19th Floor Ottawa, Ontario K1A 0C8

Re: Notice No. 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.

Canada Gazette, Part I, Publication date 12 May 2012

The Marconi Radio Club of Newfoundland (MRCN) are grateful for the opportunity to comment on these proposed changes. MRCN was incorporated in 2001 to promote science, engineering and technology. We have conducted experiments in support of domestic allocations to the Amateur Service at 137, 500 and 5000 kHz by designing, constructing and operating state of the art apparatus. This yielded information that was used by the Radio Amateurs of Canada (RAC) to secure spectra at about 137 and 475 kHz at the World Radio Conferences of 2007 and 2012. Our findings on the 5 MHz band were published on the internet and in the November-December 2010 issue of "The Canadian Amateur", pp 33-34. We support the allocation of spectrum near 5000 kHz to the amateur service.

The harmonisation of the frequencies with the United states is agreeable as a preliminary allocation, however more flexibility will greatly enhance the utility of 5329 kHz. We found 5 MHz to be subject to considerable interference from electrical storms. Accordingly, more optimal use of this frequency will be made by allowing more transmitter power to overcome this interference. 5329 kHz and 5319 kHz were two of several frequencies initially selected by MRCN and approved by Industry Canada in 2002. Despite our extended transmissions, including continuous beacon operation on 5329 kHz, there were no reports of interference of any kind. This is unlikely to change by increasing the power output to 250 watts or up to 1000 watts DC input as is permitted for the Amateur Service on the other bands.

The bandwidth restriction should be 6 kHz rather than 2.8 kHz, consistent with the other Amateur HF allocations. Because 5219 kHz is now unavailable, there will tend to be more occupancy on 5329 kHz. A 6 kHz bandwidth will allow better utilisation of 5239 kHz by providing more spectrum to better accommodate diverse usage including experimental transmissions along with communications. For this reason, bandwidth specification is preferable to an emission designation. The latter could restrict experimentation with new modes. We are in favour of permitting domestic communications on 5329 kHz but do not wish to preclude either communications with foreign administrations or technical investigations on this frequency.

We wish to express our gratitude to the many amateurs and clubs of Newfoundland and Labrador who contributed to the success of our experiments and to RAC. We hope this information will be useful to Industry Canada.

J. Craig

Marconi Radio Club of Newfoundland