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**Consultation on Changes to the Canadian Table of Frequency Allocations
and to RBR-4 to Allow for Amateur Radio Service Use of the 5 MHz Band SMSE-010-12**

My comments regarding the update of RBR-4 follow the numbered reference questions published by Industry Canada:

(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.

I think Industry Canada should allow these additional frequencies. They are needed for additional emergency communication capacity. Harmonization of frequency allocations with the US will guarantee successful cross border emergency operations.

(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)?

In the spirit of the harmonization supported in (1), the emission modes & designators should be the same as specified by US regulation.

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

From my experience operating with my 60 metre developmental licence, I find less than 100 W ERP adequate. I recommend regulating ERP at higher levels to facilitate innovation in antenna design. I suggest 12 dB with respect to a dipole. However, the out-put power from the transmitter should remain at 100 W PEP.

(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.

I support the allotment of a sixth channel, bandwidth restricted to 2.8 kHz.

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

The channel referred to in (5) is not shared with the US, as such I see no reason to harmonize regulation with the US. I suggest Industry Canada limit restrictions on emissions as little as possible. I encourage Industry Canada to open this channel to roaming within the 2.8 kHz allocation when using narrow mode digital emissions. This will encourage the development of a flexible digital emergency communication capability. Additionally I recommend the channel be open for communication with amateurs in other jurisdictions where the frequency is authorized for amateur use.

Thank you for the opportunity to comment on the Canadian 60 metre allocations.

73,

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