

Steinbach, MB

30 May 2012

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Invited Comments - Changes to the Canadian Table of Frequency

Allocations and to RBR-4 Amateur Radio Service Use 5 MHz Band

Reference: A. Canada Gazette part 1 Vol. 146, No. 19, 12 May 2012
B. Notice Industry Cda SMSE-010-12, May 2012

00. Comments and rationale are submitted in the order of the posed questions at Reference B.

01. Yes. Industry Canada should permit Amateur Radio Service use on the following five frequencies: 5332 kHz, 5348 kHz, 5358.5 kHz, 5373 kHz and 5405 kHz. Operation would be on a harmonized basis with U.S. Amateur Service and on a no-protection, no-interference basis with primary users. Transmissions would be restricted to a 2.8 kHz bandwidth centred on each of these frequencies.

02. No. The existing Canadian Amateur Service does NOT impose any emission modes or designators on the Amateur portion of the HF spectrum. The sole restriction should be that any and all emissions shall not exceed a 2.8 kHz bandwidth.

03. No. The existing Canadian Amateur Service power restrictions are sufficient to ensure quasi-reliable communications under degraded HF propagation environments. However, it is conceded that a 100 watt upper power limit might reduce the risk of interference to primary users in other parts of the world.

04. Yes. The allocation of 5329 kHz to Amateur Service use would permit a national (Canadian), exclusive channel, for strictly domestic traffic. Were there a North American event that escalated traffic on the 'shared' harmonized channels, a domestic only channel would expedite passage of Canadian only traffic. Again, the 2.8 kHz bandwidth restriction is reasonable.

05. No. If emission designators, modes or power restrictions need to be imposed on the 'national' channel, then, they ought to be the same as on the five 'harmonized' channels. Ideally, the only 5 MHz restrictions should be the 2.8 kHz bandwidth limit plus the standard Canadian HF spectrum power limit.

06. The five MHz spectrum is an ideal 'gap filler' band, between the 80 metre and 40 metre Amateur assignments. It would permit communication between local stations, intra-provincial, as well as national and continental stations. The five MHz spectrum will be invaluable under emergency conditions.

07. There should be no emission or mode restrictions, save for the 2.8 kHz occupied bandwidth limit. Regrettably, the regulatory frame work is often years behind the rapid march of technology, especially newer modulation schemes that continue to pack more bits into a given channel. Let the Shannon limit be the final judge and arbiter of what bit rate can be transmitted on a 'noisy' HF 2.8 kHz channel.

08. Earliest possible Amateur Service access to the five MHz spectrum would be appreciated. This would permit Amateurs to configure their station plant for these frequencies and begin training to acquire meaningful experience using this portion of the spectrum for emergency services.

Yours truly,

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