Manager – Mobile Systems
Industry Canada
300 Slater Street. 19th Floor
Ottawa, Ontario
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Re: Canada Gazette, Part 1 – May 2012
Gazette Notice SMSE-010-12 – Department of Industry – Radiocommunication Act
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

My comments to this notice follows:

1. Frequencies

Industry Canada should allow amateur radio operators to use the five frequencies listed.

After examining current assignments in TAFL, there appears to be unallocated
spectrum in the 5250-5450 KHz band that could additionally be allocated to the amateur
service on a secondary basis. Namely - 5305 to 5310, 5345 to 5365 and 5440 to 5450
KHz, a total of 35 KHz. Operation by amateurs in these sub-bands would not conflict
with any existing Canadian licensees.

There should be a long term goal to eventually allocate all of the 5250-5450 KHz band
to the amateur radio service. This spectrum will serve emergency communication
groups better than any other frequency bands currently available.

Industry Canada should refrain from assigning spectrum to new FIXED and MOBILE
licensees in the 5250-5450 KHz band. A review every 3 or 4 years would probably
show that more primary band users would have found other means of communications
and these sub-bands could then be extended for amateur radio use.

2. Bandwidth

The allocated bandwidth should be 6 kHz. Do not specify the modes of operation.
Amateur operation harmonizes quite well on all other existing amateur radio bands and
there is no reason to think that harmonization has to be addressed specifically for 60
meter spectrum. Micro spectrum management by regulation is not required.
3. Power

100 watts peak envelope power does not make much sense as the vast majority of HF amateur transceivers on the market are rated for 100 to 200 watts carrier power. Consider limiting the power to 560 W peak envelop power or 190W carrier power, the same as the power levels specified in section 10.1 of RBR-4.

4. 5329 KHz.

Permit access to frequency 5329 KHz. Amateur operators are permitted to communicate with other amateur radio stations only. Specifying “domestic communications only” does not make sense. The allowable bandwidth should be 6 KHz.

5. Emissions

Do not specify emission designators. Allow amateur radio operators make appropriate choices as they already do on other assigned bands. The allowable power should be the same for all 60 meter band frequencies.

6 Canadian Table of Frequency Allocations

The bandwidth specified should be 6 KHz.

Respectfully submitted

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May 22, 2012