May 23, 2012

Industry Canada Spectrum and Telecommunications

Re: Canada Gazette, Part I

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

The Department invites comments on the following:

(1) Should Industry Canada allow amateur radio operators to use the five frequencies 5332 kHz, 5348 kHz, 5385 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.

Amateur radio operators in Canada have been seeking permission to use 5 MHz for some time. The five indicated frequencies would align perfectly with the privileges of the United States Amateur radio operators. Adding these frequencies would provide additional spectrum for Canadian Amateurs to provide for better emergency communications. Harmonization with the US Amateurs on these frequencies will allow for immediate cross border operation during times of emergencies.

(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)?

Yes – harmonizing all emission modes with the United States would provide for full harmonization and easy access for cross border communications with all assigned frequencies.

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

To specify maximum effective radiated power to 100 watts peak envelope power may alleviate interference problems; however, Amateur radio operators do enjoy the latitude and ability to use the more common output power of 100 watts. At this frequency power of 100 watts output into an approximate 3 dB gain antenna (or less) – would give an estimated power of 200 watts (or less) effective radiated power (ERP). Industry Canada’s consideration to this suggested power limit would enable better and more effective communications during less than ideal band conditions. Amateur radio operators understand they are secondary to this frequency assignment and must use only the necessary power output (ERP) to carry out their communications effectively.

(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.

Yes – allowing this additional frequency allocation for ‘Canadian only’ transmissions would provide a domestic ‘interference free’ frequency for use in providing domestic emergency communications without interference from cross border Amateur radio operators.

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

Emission designators should not be to the extent of limiting experimentation and allow further development on this additional channel. Considering this is a domestic only channel – there should be no need to specify emissions to that of the United States. As for the peak envelope power for this additional channel – specify it as outlined in my answer to question 3 – suggesting 200 watts ERP.
Thank you for allowing me to comment and, Industry Canada’s consideration to the above comments/suggestions would be appreciated.

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