2012 May 29

Manager,
Mobile Systems
Industry Canada
19th Floor, 300 Slater Street
Ottawa, Ontario, K1A 0C8

Re: Canada Gazette Part 1, Vol. 146, No. 19 – May 12, 2012 – 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.

Dear Sir or Madam:

Industry Canada has invited comments in five Areas with regard to the above notice, to wit:

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.

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)?

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

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.

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

My Comments are:

1. Industry Canada should allow amateur radio operators to use the frequencies cited in Area 1, above. These are harmonized with the United States amateur allocations and, being such, will facilitate trans-national communications that will be especially valuable in connection with emergency and disaster mitigation communications that might affect both nations or benefit from both nations’ attentions.

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The proposed bandwidth is suitable for voice, digital, and other modes of communication presently known.

The no-protection and no interference bases are acceptable and amateur operators are experienced with such restrictions and responses thereto.

2. Industry Canada should not implement emission specifications, shown in Area 2, or any such specification. The current rules, references, and interpretations allow Canadian Amateur Radio operation without restriction as to specific modes as long as the bandwidth of 2.8 kHz is not exceeded. The current rules, references, and interpretations should be extended to the proposed frequencies.

3. Industry Canada should implement the proposed maximum effective radiated power of 100 Watts, peak envelope power (Area 3), as this power level normally is satisfactory for domestic and continental communications.

4. Industry Canada should provide for a Canada-domestic frequency, such as the proposed 5329 kHz frequency. It would be of value, not only as an additional general-purpose bandwidth, but also as a means of isolating domestic networking in an emergency or disaster situation simultaneously affecting Canada and the United States.

5. Industry Canada should apply the power limit cited in Area 3 to the 5329 kHz frequency of Area 5. Industry Canada should not implement emission specifications to Area 5. Instead, the bandwidth limitation of 2.8 kHz should apply. (See above comment 2)

Thanking you for your consideration, I am,

Sincerely,

Mr. Karle's signature was removed from this document at the respondent's request because of privacy concerns.
À la demande du répondant, la signature de M. Karle a été retirée pour des raisons liées au respect de la confidentialité

W. J. Karle  
VE4KZ

cc: The Radio Amateurs of Canada