



City of Richmond

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November 28, 2005
File: 09-5125-01/Vol 01

Emergency Program
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Director General, Spectrum Engineering Branch
Industry Canada
300 Slater Street
Ottawa, ON K1A 0C8

Re: Canada Gazette Notice SMSW-005-05 of July 19, 2005
Consultation Paper on Broadband over Power Line (BPL) Communications System

The City of Richmond's Emergency Management Office is the Department responsible for emergency planning, response and operations.

Richmond's Emergency Management Office works in cooperation with the Richmond Amateur Radio Club, as well as 350 residents who are licensed operators. These individuals use the authorized Amateur Radio Bands to provide emergency communications in support of the City's Emergency Communication Plan. This group makes use of the amateur radio Very High Frequency (VHF) channels during local disasters, but also are equipped with High Frequency (HF) equipment for message handling during distant emergencies. In the event of a large scale emergency in which telephone and cellular phones are not working, The City of Richmond would rely on the dedicated amateur radio volunteers to deploy to our key facilities (EOC, City Hall and Reception Centres) to establish radio communication.

We have been made aware of the above Gazette Notice regarding BPL, and we understand that some forms of this technology create severe interference across the HF and low VHF spectrum, thus rendering these channels incapable of supporting communication by radio.

Will this new technology have any impact on our existing amateur radio VHF and HF spectrums that are required for Amateur Radio? During an emergency or disaster, we will be relying on Amateur Radio to provide up to date communications for municipal emergency staff and first responders.

I ask that Industry Canada continue to protect the spectrum that is vital for use by amateur radio operators in communicating for not only the City of Richmond, but for communities in British Columbia.

Yours truly,

Derrick Lim
City of Richmond
Emergency Social Services/Volunteer Management