

RABC File: 2000

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Director General, Telecommunications Policy Branch,  
Industry Canada,  
300 Slater Street,  
Ottawa, Ontario,  
K1A 0C8

Radio Advisory Board of Canada  
Preliminary and Provisional Response to Selected Provisional Items  
DGTP-004-05 Dated 2005-12-10

Dear Mr. Shaw;

The Radio Advisory Board of Canada commends the Department for the timely release of DGTP-004-05. This is a provisional and un-balloted response to the three provisional items in the consultation paper:

- Provisional Allocation Changes in the Frequency Bands 216-220 MHz and 220-225 MHz;
- Provisional Spectrum Policy for the Frequency Band 220-222 MHz; and
- Spectrum Policy for Utility Telemetry Applications.

### **3. Provisional Allocation Changes in the Frequency Bands 216-220 MHz and 220-225 MHz**

#### **3.1 Discussion**

The Board seeks clarification on the following points in section 3.1:

- On the 3rd paragraph of section 3.1, it is mentioned that “a Canada/U.S. sharing arrangement was concluded concerning the use of the sub-band 220-222 MHz ...” The RABC understands that this was an “interim arrangement”.

In the same paragraph, it states that the Canada/U.S. sharing arrangement set aside 100 kHz of paired spectrum for the exclusive use of the amateur service within Canada and along the border. The Board is not aware of any such provision in the arrangement.

### **3.2 Provisional Allocations in the Bands 220-222 MHz and 219-220 MHz**

The board supports the proposed provisional frequency allocation changes for the frequency bands 219-220 MHz and 220-222 MHz highlighted in section 3.2 of the Notice. The RABC also supports the primary allocation to Land Mobile in the 216-220 MHz bands. In addition the RABC supports the additional flexibility provided by the new Canadian Footnote C11, permitting the amateur service (on secondary basis) to assist in disaster relief efforts in the 220-222 MHz band

## **4. Provisional Spectrum Policy for the Frequency Band 220-222 MHz**

The RABC commends Industry Canada for making this a provisional allocation with a short comment time. This will allow Canadians to benefit from this additional spectrum in a timely manner.

### **4.2 Provisional Spectrum Utilization Policy**

The Board supports

- The first come first served licensing procedure;
- Flexibility in technology;
- A channelling plan that is based on a 5 kHz grid. The Board understands that, for spectrum harmonization and alignment purposes, the standard channel spacing for this spectrum was set to 5 kHz. The RABC is not aware of any voice radio products, currently being manufactured in significant quantity, which will fit in anything less than a 12.5 kHz channel. Therefore, the Board strongly recommends that both the Spectrum Policy and the upcoming Standard Radio System Plan (SRSP) allow, on a standard basis, the aggregation of 5 KHz channels, in order to accommodate the use of available 12.5 kHz equipment. In the United States these bands were initially only assigned in 5 kHz bandwidths. It was not until the FCC allowed for channel aggregation that there began to be significant use of the band. One of the primary reason the RABC made a formal request to the Department to open up this band for land mobile operation was the expectation that 12.5 kHz equipment would be allowed on a standard basis; and
- The Departments proposals for the use of channels for sharing on the border and for other purposes such as for national use.

### **4.3 Some Technical Considerations**

As mentioned in our comments above, spectrum aggregation will be necessary for use of this band for voice communications which is needed to provide relief for the existing VHF band. .

## 8.2 Spectrum Policy for Utility Telemetry Applications

The Board notes that in its policy proposals for utility telemetry and automatic meter reading (AMR) applications, the Department has aimed at harmonizing with the U.S. Accordingly, the band 1429.5 to 1432 MHz, or 2.5 MHz, is being designated for utility telemetry and AMR applications. The Department is requesting comments by April 19, 2006 on this designation and the potential range of telemetry applications that would be permitted in the band. In the meantime, a moratorium has been placed on licensing SRS operations in channel S1 at 1427 to 1430.5 MHz and on AMR operations at 1427 to 1429.5 MHz. However, to permit planning and implementation of N-MCS systems for AMR applications, the Department has added what appears to be an exclusive designation for N-MCS for AMR in the 1429.5 to 1430.5 MHz band. The Department plans to implement this designation unless compelling arguments against it are received by January 25, 2006.

The Board supports this designation. It will permit AMR deployments at 1.4 GHz to proceed while certain other related policy issues, discussed in section 8.2.1, are dealt with in the longer consultation. The Board is aware of at least one location, Fort St. John, B.C., where AMR deployments at 1.4 GHz are planned. The Board notes that section 8.2 of the consultation paper, headed "Spectrum Policy for Utility Telemetry Applications", uses a number of inter-related terms such as N-MCS for AMR, utility telemetry, and telemetry *tout court* that will need to be discussed in the longer consultation and clarified in the final policy and related technical standards.

The remainder of the Board's comments on the complete *Gazette* notice will follow in April 2006.

Yours truly

*Original signed by*

Paul Frew  
President