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From: Rob Stewart [mailto:rob.stewart@mcmbm.com]
Sent: Wednesday, December 21, 2005 2:00 PM

To: Wireless

Subject: Comments re DGTP-004-05

Amateur Usage of 220MHz band

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As a licensed Amateur Radio Operator, I have yet to find anyone on the 220MHz band. In addition, while my VX-7 radio does operate in this band, the 300 mW maximum output makes it unusable. I therefore support the concept of Amateur usage of the 220 band moving from primary to secondary, however I would urge Industry Canada to not completely close the band to Amateur radio in the future.

MURS Usage in Canada

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As a Canadian consumer, I have been a user of CB, FRS and more recently GMRS radios within my family. While I do see some minor advantages to MURS such as perhaps better range, I do not believe that it is in the public's best interest to push the nearly 28,000 stations off frequency to bring MURS into Canada. I feel that "Joe Consumer" has little or no understanding of radio technology. The current plethora of "walkie-talkies" (to use the common vernacular) are sufficient for the market.

If Industry Canada, on one hand claims that there is a lack of bandwidth for land-mobile communications, it does not make sense on the other hand to take away bandwidth from land-mobile units to give to an unneeded consumer MURS radio service. Perhaps Industry Canada should consider moving forward with allowances for GMRS repeaters.

An alternative to MURS

I believe the purpose behind the MURS proposal is to give consumers an alternative to the FRS and GMRS bands. I believe I have an alternate suggestion that would satisfy this need without having to displace current land mobile users.

As a licensed Amateur Operator, I can extend my privileges to other unlicensed individuals as long as I remain the control operator. I would like to extend my VHF privileges to immediate family/friends in a "remote control operator" capacity. This model would be similar to the US GMRS licensing model, and would allow my family/friends to use Amateur equipment and frequencies but only as long as I remain on the same frequency to supervise. A provision to allow for a "remote operator" status, thereby allowing families/friends of licensed individuals to use the amateur band under remote supervision by the amateur in question, would satisfy the proposed need to bring in MURS without the need to displace existing licensed stations.

Industry Canada could amended the existing regulations to allow for "Remote Control Operators", say with specific band limitations such as only in VHF and specific power limitations such as a maximum of 2 Watts. A licensed Amateur could then go out backpacking with his family and give each person a radio, pre-configured, to take with them. The individuals involved would use the call sign of the amateur with a suffix such as /1,/2,/3. The actual licensed Amateur would need to

be able to gain physical access too the radio of one of the members of the group within an hour in order to prevent interference for example, and the licensed operator would be responsible for the actions and behavior of the individuals in the Group.