

TWELFTH MEETING OF
THE CANADIAN AMATEUR RADIO ADVISORY BOARD (CARAB)

DATE:

Thursday, May 27, 1999

PLACE:

Industry Canada Headquarters
Room 1585D
300 Slater Street
Ottawa, Ontario

CHAIR:

Doug Leach

PARTICIPANTS:

RAC: Bill Gillis - Director, Atlantic Region
Ken Pulfer - Vice-President, International Affairs

Industry Canada:

Mike Connolly, Senior Director, Radiocommunication and Broadcasting
Regulatory Branch
Tom Jones, Chief, Authorization
Hubert Pambrun, Eastern Ontario District Director
Gary Steckly, Technical Policy Analyst
Harold Carmicheal, Analyst, Quebec Region

1) Review and Approval of Agenda.

The agenda was approved as outlined. The chairman indicated that unfortunately, due to a family matter, the RAC Director, Quebec Daniel Lamoureux, was unable to attend.

2) Acceptance of the CARAB minutes of last meeting.

The summary record of the last meeting, CARAB 11, was approved along with the changes that had been proposed to the summary record of CARAB 9 and 10. An additional point with respect to the time lapse that occurs between meetings and the publication of the draft summary record was also discussed. The chair inquired as to the possibility of finalizing the summary record a bit quicker, particularly with respect to the action items. The secretary agreed that this was a reasonable request and suggested that in the future we agree to distribute the draft minutes for the approval by the co-chairs within one month of the meeting having taken place.

3) Status Report on RAC's 10 Metre Proposal

The proposal to change the operator qualifications for 10 metres was published in the Canada Gazette on May 1, 1999 and some comments have already been received via E-mail on the Strategis site of Industry Canada. Mr. Jones mentioned that Mr. Jim Dean had indicated that he will be submitting comments for both RAC and the Quarter Century Wireless Club (QCWA) on this subject. Mr. Doug Leach mentioned that this subject was discussed at the last meeting of QCWA, Chapter 70 and most people seemed very

supportive of the initiative. The public comment period expires July 1, 1999, at which time Industry Canada will determine whether or not to change amateur operating privileges as outlined in Radiocommunication Information Circular (RIC) - 2. As this is a change to a standards document, Industry Canada will likely publish a gazette notice announcing the modification. In a related item, Mr. Leach mentioned that at the Dayton, (U.S.A.) Hamvention several Americans stopped by the RAC booth and enquired about reciprocal privileges for operation in Canada by United States amateurs who held a Technician Plus class licence. Mr. Jones clarified the policy of Industry Canada in this regard, and Michael Connolly suggested that RAC might want to address this related matter in RAC comments regarding the 10 metre proposal.

4. Streamlining the Authorization Process for the Amateur Radio Service

The discussion paper was published by Industry Canada on May 15, 1999 and a notice appeared on that date in the Canada Gazette. Public comments with respect to the streamlining initiative are being received via the Industry Canada Strategis web site. Mr. Jones mentioned that letters have been sent to approximately 1400 Canadian amateur clubs informing them of this proposal and inviting comment. Enclosed with the letter is a copy of the discussion paper as well as the question and answers document. These documents are also available on the Industry Canada web site.

Industry Canada indicated that they feel that the current proposal has been sufficiently modified in order to address the concerns raised by RAC at the last CARAB meeting. In the discussion document, a 6 month time allowance for submitting address changes by amateurs is being proposed, after which time an amateur would be in contravention of the Radiocommunication Regulations and subject to the appropriate penalties. As well, Section 4.1 of the question and answers document outlines the international significance of the move to the single authorization, that being the issuance of an operator certificate with the station call sign, rather than two separate authorization documents. Mr. Gillis suggested that, assuming this proposal is put in place in the future, Industry Canada and RAC periodically review the effectiveness of the process through the CARAB forum to ensure it is working satisfactorily and make adjustments as necessary. Industry Canada stated that, although they anticipate that this proposal will be beneficial for amateur radio, they are always prepared to evaluate any new or existing authorization process and make changes if they are required.

5) Status Report by Industry Canada on RAC's Request for Frequency Allocations for the Amateur Service.

Dr. Ken Pulfer indicated that he had discussed the matter with Fern Léger of Industry Canada with respect to progress on obtaining an allocation at 2.4 Ghz for amateurs. Mr. Léger had indicated to Dr. Pulfer that he would be responding in the future, however there has been nothing forth coming on this matter to date. Mr. Jones indicated that he had spoken with Murray Hunt of Industry Canada's spectrum allocation and utilization policy directorate and Mr. Hunt indicated that the matter was still under consideration. Dr. Pulfer indicated that he would approach Mr. Léger again on this issue.

RAC has also recently requested a Very Low Frequency (VLF) allocation for amateurs in the 135.7-137.8 Khz band. Mr. Jones reported that he had spoken to Murray Hunt who is also dealing with this item, and as Mr. Hunt has only recently received the request, there is nothing to report at this time. Mr. Jones stated that, in his opinion, this item should not be controversial as amateurs are only requesting secondary status in the band.

RAC have also received a request for assistance from an individual in obtaining a developmental licence for experimentation in the low frequency bands. Industry Canada responded that such requests can be dealt with by a District office and Headquarters need not be involved in the process.

6. Revision of Examination Question Banks

Mr. Jones provided an update on the implementation of the new question banks and suggested that January 1, 2000 should be the target date for implementation. This will provide approximately 6 months advance warning for delegated examiners to familiarize themselves with the new question banks. Mr. Jones suggested that it would be a good idea if Industry Canada published an advertisement in the RAC/RAQI magazine to inform amateurs of the new question banks. Industry Canada will be publishing these question banks as documents in the RIC format, therefore they will be available to the public electronically and Industry Canada will not distribute hard copies to delegated examiners. Also, should RAC want to distribute any of this information in a hard copy format, they would be welcome to do so.

7. Status of 220 - 222 MHZ

Mr. Jones informed that the draft agreement has been finalized to the satisfaction of both the Canadian and United States administrations. The Federal Communications Commission (FCC) are currently in the process of determining if their State Department must be involved in promulgation of the agreement and if not, both administrations intend to formally ratify the agreement at the next meeting of the Radio Technical Liaison Committee which is scheduled to take place in September. If the U.S. State Department needs to be involved, then it may take longer to officially ratify the sharing arrangement.

Mr. Leach asked that RAC be given a "heads up" if possible prior to this agreement being finalized. Industry Canada agreed to do so, however, until it is officially ratified the terms of the arrangement cannot be circulated within the amateur community. Mr. Jones will check with the engineering branch of Industry Canada to see if any draft documentation could be circulated to RAC in advance of formal ratification.

8. Recommendations of the Call Sign Working Group(CSWG)

Mr. Jones distributed copies to the CARAB members of the letter from RAC dated September 9, 1998. This letter had been forwarded to Industry Canada by RAC with

respect to the RAC/RAQI public comment initiative and review regarding the recommendations of the CSWG. Industry Canada addressed the points brought forward in the following manner. Quotations from the letter are shown in italic typeface and Industry Canada's response as follows:

a) Portability of call signs from province to province. There was concern by respondents that existing policies are not being applied equally and consistently by Industry Canada offices from coast to coast. Amateurs recommended that retention of an original call sign (e.g. government employees, military personnel being relocated for work reasons) should be permitted under certain circumstances and its use permitted in another area but only to be used with a portable suffix identifying the new call area.

When an amateur relocates, on a temporary basis, and providing a portable suffix is employed to identify the new call area, Industry Canada will allow for call sign portability.

b) Special Event Call Signs. A significant minority of respondents felt that special event calls should be made available to individuals and not limited to clubs. What constitutes a recognized club was also questioned.

Industry Canada has no criteria for defining what constitutes an amateur club, therefore special event call signs will be made available to individuals as well clubs. The rationale for assigning special call signs was discussed and, from Industry Canada's perspective, it is the responsibility of the amateur community in determining what constitutes a special event. It may be appropriate that, before special event call signs are issued, RAC as the national amateur organization is consulted by Industry Canada for their views as to the appropriateness of the request. RAC's opinion would not necessarily be binding with respect to Industry Canada's final decision. Industry Canada would however, be willing to consider RAC's views regarding the merits of the request before issuing such special event call signs. RAC stated that such potential involvement on their part would require further internal discussion before they could comment on this proposal by Industry Canada.

c) Call signs beginning with "Q". Amateurs considered that the use of call signs with Q code suffixes was inappropriate and should be stopped. It was acknowledged that a number have been requested and issued.

Industry Canada stated that, outside of the letters QST as agreed to in the past, they have been assigning "Q" call signs upon request. Mr. Gillis mentioned that it was previously discussed that issuance of the "Q" suffixes was in violation of the International Telecommunication Union (ITU) Radio Regulations. Industry Canada stated that they believed the ITU reference was a recommendation rather than a regulation however they would re-examine this situation and also determine what other administrations have done. If there is a solid basis for not assigning these types of call signs, Industry Canada will reconsider the current policy.

d) Call signs beginning with letter “R”. A number of respondents felt that call sign suffixes beginning with “R” should be reserved for repeaters and repeaters should be restricted to “R” call signs.

Although in the Quebec region such call signs have been traditionally reserved by Industry Canada for repeaters this practice is not followed across the country. Therefore, it would be difficult to justify the implementation of such a policy nationally given the disruption it would entail.

e) Assignment of call signs with two-letter suffixes. Some respondents remarked that only clubs should be permitted to have two, two-letter call signs, that is the VE and VA prefixes, to minimize confusion from call signs.

As, once again, Industry Canada does not apply criteria to determine what constitutes an amateur radio club, they did not feel that it is practical to assign two letter suffixes strictly with respect to club stations.

f) Consistent application of call sign policy. Amateurs asked that a new call sign policy be applied consistently by the department from coast to coast, noting that currently there is a lack of consistency in call sign assignment even within the same region.

Amateurs from various locations across Canada have indicated that they would like to see a consistent approach applied by Industry Canada across the country with respect to call sign assignment. Industry Canada stated that they realize that, historically, there has been different criteria applied regionally and even locally with respect to issuance of amateur call signs. Industry Canada understands that there is a concern among the amateur community for consistent application of call sign policy and with a single point of delivery for amateur authorizations being put in place, this will now happen.

Mr. Leach emphasized that a policy document will likely need to be created by Industry Canada in order to clearly explain the process and rationale to amateurs regarding call sign assignment. Industry Canada agreed with this suggestion and pointed out that one of the first issues that needs to be addressed is the assignment of two letter suffix call signs. There are currently several different policy variations of eligibility criteria being applied in different regions in Canada with respect to the issuance of two letter call signs. Recognizing that many amateur operators attach a certain level of prestige to the assignment of such a call sign, Industry Canada will need to formalize a standard policy with respect to eligibility criteria in this regard and implement it nationally. Before doing so, Industry Canada agreed to provide RAC with a draft version of the proposed two letter suffix call sign policy document for their comment.

9. Industry Canada Policy with Respect to Examinations for Disabled Amateur Candidates.

Concern was expressed by RAC that, with respect to accommodated testing for candidates with a disability, even with the requirement for the production of a doctor's

certificate, the process was still open to abuse. Mr. Jones clarified that Industry Canada's policy, as outlined in RIC 1, doesn't require that a doctor's certificate must be produced by a candidate in order to obtain accommodated testing. This is at the discretion of the examiner and it is recommended in cases where the disability may not be obvious.

Mr. Leach mentioned how the FCC handles this type of situation, by providing an attachment to their documentation that provides guidance for the doctor in order that they can more readily make a decision with respect to the person's ability to take the examination in a standard format. Mr. Jones stated that this type of approach was investigated by Industry Canada in the past, however Industry Canada needs to be extremely careful as they are not in a position to provide an opinion on the severity of a disability or to make a determination of impairment. Mr. Leach agreed to forward a copy of the FCC's procedure to Industry Canada for their consideration.

10. Modifications to Accredited Examiner Qualifications

RAC has no problem with an accredited examiner conducting a written examination for someone attempting a higher level certificate than that held by the examiner. However, they feel that for the Morse code testing, the examiner must be competent at at least the same level at which the applicant is being tested. While RAC does not believe that there is a problem with this particular type of situation, they feel it would be helpful to include this point in the RIC for accredited examiners, more as a matter of guidance for examiners, rather than an absolute prohibition. A short statement to the effect that it would be inappropriate to perform examinations where the examiner does not hold an equivalent qualification, is likely quite satisfactory. Industry Canada agreed to develop wording to this effect.

11. Status Report on Ticketing Regulations

In regards to the Contraventions Act, Mr. Jones gave a report on the provinces that have now agreed to initiate these types of federal ticketing actions. It is anticipated that all provinces and territories in Canada will have initiated these regulations by the spring of the year 2000.

12. Status Report on Townsend Study

Industry Canada had hoped to be able to undertake a subsequent study on antenna structure consultation issues, however due a number of reasons this was not possible. In the interim, the association of Canadian Municipalities has begun work with the Canadian Wireless Telecommunications Association to develop guidelines for use in consultation with municipalities. As a related item, Mr. Connolly mentioned that there was a recent report published by the Royal Society of Canada with respect to the adequacy of Health Canada's safety code 6. Although the findings were positive, RAC members may be interested in this report as there were some recommendations made regarding exposure limits for professionals working in areas of high radio frequency

fields.

13. CEPT Permits and Administration After Streamlining of the Authorization Process

Dr. Pulfer questioned whether RAC would still be required to issue CEPT permits should the new single authorization for amateurs be put in place. Mr. Jones responded that Industry Canada did not intend to change the current process in this respect, and would continue to delegate the issuance of the CEPT and IARU permits to RAC.

14. Industry Canada Update on the Single Point of Service for Amateur Authorization.

Mr. Hubert Pambrun gave a brief update on how the single point of service initiative is progressing. Starting next Tuesday, June 1, all radio licence applications as well as amateur operator certificates will be processed from a single office. The call sign data base should be available on the RAC web site before the end of July.

RAC stated that RAQI has mentioned that there may be some concern in Quebec among amateurs with respect to the concept of a single point of contact. Mr. Connolly pointed out that there are many services administered nationally by the federal government from a single point, and in such a delivery mechanism, service to all Canadians is never compromised.

15. Additional Item.

Mr. Leach stated that a situation had been brought to the attention of RAC with respect to amateurs in Quebec who are allegedly communicating with individuals operating on board vessels outside of Canada who are not licenced amateurs. He understood that this situation had been under investigation for sometime and requested Industry Canada's comments on the matter. Mr. Jones advised that this matter was ongoing and investigations had been carried out by staff from the Quebec region. He would check further to determine if there had been some resolution in this regard. Mr. Connolly added that, in this circumstance, there appeared to be certain practical limitations to Industry Canada's ability to take action, imposed by the locations where these infractions are allegedly occurring.

16. Preparation for 13th CARAB Meeting - Date, Time and Place

It is not certain when the next executive meeting of RAC will be held. Therefore Mr. Jones suggested that we wait until RAC has finalized a date and then we can schedule a mutually convenient date for the next CARAB meeting. This was agreed to by RAC.