

**FOURTEENTH MEETING OF
THE CANADIAN AMATEUR RADIO ADVISORY BOARD (CARAB)**

DATE:

April 27, 2000

PLACE:

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

CHAIR:

Kenneth Oelke

PARTICIPANTS:

RAC: Kenneth Oelke - President

Dr. Kenneth Pulfer - Vice-President, Government and International Affairs

Bill Gillis - Regional Director, Atlantic

Daniel Lamoureux - Regional Director, Quebec

Ralph Webb - First Vice President - Observer

James Dean - Observer

Industry Canada:

Tom Jones, Chief, Authorization

Darius Breau, Manager, Operational Policies

Harold Carmichael, Program Manager, Certificates and Examinations, Quebec
Region

1) Review and Approval of Agenda.

The agenda was approved as outlined. The chair indicated that unfortunately, due to a last minute matter, the Industry Canada co-chair, Mike Connolly, was unable to attend. The chair also introduced Mr. Ralph Webb to the group and congratulated him on his election as the new RAC First Vice-President.

2) Acceptance of the CARAB minutes of last meeting.

The summary record of the last meeting (October 22, 1999) was approved. It was also pointed out that, in the past, the minutes of CARAB had been approved before the translated version was available. RAC requested that both official language versions of the minutes be available before final approval by the co-chairs. The secretary agreed to provide the co-chairs versions in both official languages for their approval.

3) Status Report by Industry Canada on Streamlining the Authorization Process for the Amateur Radio Service.

- Remaining Errors in the Call Sign Database.

Industry Canada indicated that with the re-issuance of the certificate of proficiency for amateurs which now referenced the amateur station call sign(s), they currently have several hundred requests on hand requiring corrections. This situation was not unexpected due to differences that existed between similar records in the two former databases (licensing and certification) when the matching exercise was undertaken. Most of these errors have to do with names, addresses or operator qualifications. Should amateurs detect any errors in the new certificate of proficiency, they should inform the Amateur Radio Service Centre who will correct the error(s) and issue a revised certificate at no charge.

- 12 W.P.M versus 15 W.P.M. on the certificate.

Some amateur operators voiced concerns as their Morse code qualification appeared as 12 w.p.m on the re-issued certificate of proficiency rather than 15 w.p.m. as indicated on their existing amateur certificate. Industry Canada pointed out that since the amateur restructuring regulations came into force in 1990, there has been no amateur Morse code qualification of 15 w.p.m and therefore holders of this qualification were automatically grand fathered to the closest qualification equivalency, which was 12 w.p.m. As the 15 w.p.m qualification had ceased to exist in regulation, and therefore held no significance with respect to operating privileges, it was not indicated on re-issued certificates of proficiency nor was this information retained in the Industry Canada database.

Industry Canada pointed out that amateur operator certificates are valid for the life of the holder (subject to revocation) and therefore all existing amateur certificates remain in force. With respect to the Radiocommunication Regulations, there is no legal requirement that radio amateurs hold the re-issued certificate of proficiency that was mailed in April of this year to all amateurs holding a valid radio station licence. This certificate re-issuance was carried out simply because, as of April 1, 2000, amateurs had been exempted from the requirement to be issued a radio station licence and Industry Canada had developed a new format for the certificate of proficiency. In order that all active amateur operators could retain a printed record of their station call sign(s) it was felt that all amateurs should be issued this new certificate of proficiency. This document also reflects their current operator qualifications or qualification equivalencies, but it is not meant to replace past operator qualifications.

RAC stated that from the comments they had received it appears that the amateur community has accepted the new certificate as a significant improvement in service. The decision to issue both a display and wallet size certificate of proficiency has been seen as a positive development. RAC mentioned that some amateurs have questioned the legality

of not having the Minister's signature appear on the certificate of proficiency. Industry Canada responded that there is no legal requirement for the Minister or any other government official to sign Departmental authorizations in order that they be considered valid. With respect to radio and spectrum licences for example, neither the Minister nor any other Departmental official's signature appears on the licence.

- Demand for special call signs

RAC stated that they were receiving some requests from amateurs for special call signs, who were now unsure how these were to be dealt with since a radio licence was no longer required. Industry Canada stated that the callsign assignment policy was being applied as indicated in the various procedural documents. An example of this is the VEO prefix, which is still being assigned as per the prescribed call sign policy. However, the call sign assignment fee would be applied to requests for special call signs. The matter of amateurs with addresses outside of Canada appearing in the callsign database was also discussed. Industry Canada stated that, as one did not require to be a Canadian citizen to hold an amateur certificate of proficiency, this situation could certainly arise. However, as amateur call signs are assigned with respect to regional prefixes, the assigned prefix is determined by the mailing address of the amateur. Industry Canada was unsure of exactly what might have transpired in such cases and felt they would need to examine some specific situations of this type before giving RAC a definitive reply on how such situations are handled.

-Available Call Sign List Contract.

Work has now been completed by RAC and the callsign available list is in operation on the RAC web site. Industry Canada congratulated RAC for their efforts in this project as the system appears to be working very well.

- CEPT and IARP Permits.

In accordance with international agreement, RAC will continue to issue these permits which are valid for a period of one year from the date of issue. It was pointed out that a minor amendment was required to the CEPT document which still referred to an amateur station licence.

4) Status Report by Industry Canada on the New Amateur Radio Service Centre.

Starting April 1, 1999 all amateur certificates have been issued from the Amateur Service Centre located in Ottawa and all accredited examiners are now managed from this centre. Although the project to rationalize the amateur call sign and operator certificate data bases has been completed and the new call sign/certificate qualification data base has been available on the RAC web site for some time, there may still be entries that need correcting. If amateurs have concerns in this regard they should deal directly with the Amateur Service Centre, either by e-mail, fax, mail or telephone.

The Amateur Radio Service Centre has been in operation for approximately 1 year now and, as a general observation, both Industry Canada and RAC feel that the transition to a single point of service for amateur authorizations has been a success and appears to have been well received by the amateur community. As the authorization process has been nationalized, it would appear logical to assume that there is now a more uniform application of policy for amateurs across the country than was the case when they were dealing with many different offices.

5) Status Report by Industry Canada Regarding the Policy for Examinations of Disabled Amateur Candidates.

At the last CARAB 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 open to abuse. RAC felt that adopting a position similar to that of the Federal Communications Commission (FCC) would address this concern. The FCC have a publication whereby they provide guidance for the doctor in order that they can more readily make a decision with respect to the persons ability to take the examination in a standard format. By providing this information, RAC felt it gives medical experts a better basis for making their assessment. As well, it should be clearly understood by accredited examiners that they are under no obligation to provide accommodated testing to amateur candidates.

Mr. Jones stated that he had discussed the matter with others in Industry Canada and felt the concept of an information document had merit. Industry Canada felt that the form produced by Mr. Leach was a dramatic improvement from the FCC document and it would be very useful as the basis for drafting an information bulletin. Mr. Jones stated that Industry Canada would provide RAC the opportunity to comment on this bulletin before finalizing.

6) Status Report by Industry Canada on RIC - 9 - Call Sign Policy.

As discussed at the last CARAB meeting, Industry Canada has produced a policy document, Radiocommunication Information Circular (RIC) - 9, in order to clearly explain the process and rationale to amateurs regarding call sign assignment. One of the most controversial issues that needed to be addressed was with respect to the assignment of two letter suffix call signs. Industry Canada has now finalized a national policy articulating the eligibility criteria for amateurs to hold a two letter call sign and this criteria is applied nationally. Industry Canada had provided RAC with a draft version of the proposed call sign policy document and wished to thank them for their input in bringing this matter to a successful conclusion.

7) RAC's Proposal to Drop 12 W.P.M. Morse Code Requirement.

There is an ongoing debate within the amateur community concerning the appropriateness of retaining the requirement that amateur operators possess a knowledge of the Morse code as indicated in S25.5 of the International Telecommunication Union,

Radio Regulations. Given the recent removal of Morse code for international maritime communications and its declining use internationally by all government and military organizations, RAC proposed that Industry Canada consider the elimination of 12 W.P.M. Morse code examination for amateurs in order to hold full operating privileges in the high frequency (HF) bands.

RAC is proposing this step with due regard to the wishes of Canadian amateurs as well as their recognition of trends that have been occurring internationally. RAC noted that this proposal would give Canadian amateurs operating privileges similar to those that have currently been accorded to United States amateurs. Many European countries have already decreased their Morse code qualifications for amateur operators or they are in the process of such consideration.

RAC will be formally approaching Industry Canada with this proposal in the near future. At the same time, RAC will request that Industry Canada consider the augmentation of the amateur examination process in order to strengthen and expand the level of operator knowledge with respect to radio station technical and operating practices to include the modern modes of communications being employed by amateurs.

Industry Canada recognized that the techniques and operations employed by radio amateurs was rapidly evolving and commended RAC for taking this type of pro-active approach in representing the Canadian amateur community. Industry Canada would certainly be prepared to give serious consideration to a proposal from RAC such as has been described.

8) Status Report by Industry Canada on the Examination Question Banks.

Mr. Jones provided an update on the **new question banks as reflected in RIC 7 and RIC 8**. Industry Canada has recently published these question banks as Radiocommunication Information Circulars (RIC's), and they are available to the public electronically from the Strategis web site. The first amendment to the basic (RIC-7) question bank is currently being finalized to reflect the changes in regulation with respect to the amateur streamlining initiative and this revised version will be available shortly. It had been anticipated that July 1, 2000 would be the target date for voluntary implementation of the new question banks by accredited examiners. This would provide approximately 6 months advance notice for accredited examiners to familiarize themselves with the new question banks.

As of this date, Industry Canada had also planned to provide, through the Strategis web site, an **examination generator for the amateur operator examinations**. Unfortunately, this feature will not be available to the amateur community as of July 1, 2000. In any event, Industry Canada still plans to have the new examination system in place by January 1, 2001. As well, Industry Canada will ensure that there is a phase in period before discontinuing the old examination question banks in order that there be minimum inconvenience for accredited examiners.

RAC indicated that currently, on a world wide basis, it appears that the knowledge requirements for amateur operators is dramatically changing, an indication of this being the situation previously mentioned with regard to knowledge of the Morse code. As a consequence of such change, RAC enquired if Industry Canada would be receptive to substantive **changes in the amateur examination format in order to cover new areas with respect to operating knowledge and ethics.** Industry Canada responded that they recognized that, like all other sectors involved in the wireless telecommunication, amateur operation was changing dramatically and they would certainly be receptive to suggestions from RAC on how the current examination structure could be improved to better serve the amateur community.

9) Status Report by Industry Canada - Association of Canadian Municipalities and Antenna Supporting Structures.

As had been discussed at the last CARAB meeting, the Board of Directors of the Canadian Wireless and Telecommunications Association (CWTA) created a new committee to deal specifically with municipal issues. The Municipal Affairs Committee is mandated to monitor municipal activities related to various antenna siting policies and provide timely information on various practices and to develop industry consensus and policy regarding the establishment of communication sites.

As an initial step, the committee is working cooperatively with the Federation of Canadian Municipalities (FCM) on basic principles and a general consultative process related to the installation of antenna towers. This process has been ongoing for some time now however to date, Industry Canada is not aware of their progress in this area. Industry Canada will be corresponding with the chair person of the CWTA Municipal Affairs Committee in order to get an appreciation of their progress to date.

10) Industry Canada Status Report on the 220 - 222 MHZ Sharing Agreement with the United States.

Mr. Jones advised that the agreement has been officially ratified by both the Canadian and United States administrations and the full text of the arrangement is available on the Industry Canada web site. RAC stated that, as the official text is somewhat complex, they have developed a guide for Canadian radio amateurs to use which outlines the intent and criteria to be followed by amateurs in accordance with the arrangement. RAC cautions however, that current and future users of 220-222 MHZ should examine the published agreement to ensure that their operations will conform to the provisions of the agreement in terms of frequencies and power and antenna height limitations.

11) RAC's Status Report on Request for Frequency Allocations for the Amateur Service.

As discussed at the last CARAB meeting, Dr. Ken Pulfer indicated that he had not heard from Industry Canada with respect to progress **on obtaining a primary allocation at 2.4 GHz for amateurs.** 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**. Dr. Pulfer also reported that he had not heard from Industry Canada with respect to this matter as well. Dr. Pulfer stated that , Murray Hunt who had been dealing with this item for Industry Canada, had recently retired and Dr. Pulfer is following up on this matter with Mr. Hunt's successor.

RAC pointed to a situation in the United States whereby amateur participants in an experimental operation on frequencies outside the amateur band have been issued experimental licences by the Federal Communications Commission (FCC) to perform tests in the 5 MHz band. RAC asked what would be the reaction of Industry Canada to these types of requests from amateur operators? Industry Canada stated that, in the past, they have authorized such operation by amateurs under the Canadian equivalent to the United States experimental licence, which is a developmental licence. Such requests would generally be entertained only in situations where experimentation is required to determine the desirability of regulatory proposals such as future changes to frequency utilization or allocations.

12) Status Report by Industry Canada - Implementation of Ticketing for Under the Contraventions Act.

Mr. Jones reported that the issuance of tickets for contraventions of federal statutes and regulations is now in place in all the provinces with the exception of Newfoundland, Nova Scotia, Alberta, Saskatchewan and British Columbia. It is anticipated that all provinces and territories in Canada will have concluded agreements with the Federal Government and will have operational regimes in place by the end of the year 2000.

RAC questioned that, with respect to the recent streamlining initiative for the amateur service, would the Contraventions Act schedule require amendment as the operator certificate was now the single amateur authorization? Industry Canada felt that the provision in the list of contraventions for unauthorized operation of amateur radio apparatus was broad enough to cover the current situation. However, it was a question that should be investigated in detail to ensure additional clarification was not needed. Industry Canada agreed to investigate this matter further and outline to RAC specifically how such a contravention item would be handled.

13) Unlicensed Devices - Enforcement of RSS-210

RAC is concerned that with the trend toward wireless services, more low power wireless devices are appearing on the market. These devices, along with other licensed services, tend to share frequency bands with the amateur service and RAC is concerned about the future impact on amateur radio. RAC realizes that amateurs have secondary status in many of the frequency bands that they operate in, however they are concerned about the increasing potential for interference to and from licence exempt apparatus which may be allowed to operate in these bands.

Industry Canada agreed that the proliferation of wireless services will continue to escalate and no doubt this will include licence exempt devices. It should be recognized however, that license exempt services are still required to operate within a regulatory framework and it should

not be perceived that simply because a device is licence exempt, it can operate without restrictions. In determining whether or not a certain device can be operated in a licence exempted manner, Industry Canada performs a risk assessment evaluation with respect to the potential negative impact on existing radio services as well as the risk of receiving interference. Only in situations where the risk is deemed to be acceptable are these devices allowed to operate in a licence exempt mode.

With respect to amateurs, as has been noted, many of the bands in which they operate are allocated to them on a secondary basis. Therefore, as increasing pressure is placed on radiofrequency spectrum usage, it is quite conceivable that other wireless services, including low power licence exempt devices, will increasingly share the same frequency spectrum. It will be necessary that all users, including amateurs and the operators of low power devices, take advantage of technical and operational techniques available for frequency sharing in order to minimize the potential for interference.

14) New or Other Business.

There were no additional items however Mr. Ken Oelke wished to once again advise Industry Canada that RAC had received generally positive responses from the amateur community with respect to the amateur streamlining initiative and the new Certificate of Proficiency. Industry Canada noted that RAC should also be congratulated for their ability to effectively represent the views of the amateur community with respect to such types of initiatives.

15) Preparation for the 15th CARAB Meeting - Date, Time and Place.

The chair indicated that the Quarter Century Wireless Association's National Convention will be held in Toronto in mid-October and, as he will likely attend, it would also be a good opportunity to hold the next meeting of the CARAB. Industry Canada felt that this was a reasonable suggestion and a specific date and place can be mutually agreed on subject to future discussion.