



March 1, 2019

Ms. Josette Gallant
Director, Regulatory Standards
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5
(Submitted by email)

Dear Ms. Gallant,

Re: GL-08, Issue 2 - Guidelines for the Preparation of Radio Frequency (RF) Exposure Compliance Reports for Radiocommunication and Broadcasting Antenna Systems

In December 2018, the Department requested the RABC review draft Issue 2 containing proposed reversions to GL-08.

The Board assigned the review to the Safety Code 6 Working Group, which is a subcommittee of the RABC Broadcasting Committee. The working group has approximately 60 members, with representatives of the broadcasting, public safety and radiocommunication communities. The working group held two calls to deal specifically with GL-08. As you know, the working group has been working extensively with the Department in regard to the Safety Code 6 Client Reporting Program.

As members noted during our calls, it is difficult to complete the review of GL-08 in isolation from our ongoing efforts to identify areas for improvement to the client reporting program. Some of the improvement areas could ultimately be reflected in an updated version of GL-08. Further, as explained by the Department during the January RABC Quarterly Meeting, Client Procedures Circular (CPC-2-0-20) - *Radio Frequency (RF) Fields — Signs and Access Control*, is under review internally by the Department and proposed changes may be sent to the RABC for review. We understand that some of the proposed changes to the CPC should also be reflected in GL-08.

Today, under separate cover, we have written to the Senior Director, Spectrum Operations, to request a meeting with the Department for a detailed discussion of some of the technical

matters pertaining to compliance with Safety Code 6. It may be beneficial for the Department to delay publishing revisions to GL-08, until we have had opportunity to hold these discussions.

As an output of our review of GL-08, please find attached a mark-up version with the Board's comments and suggestions.

We appreciate the opportunity to review the proposed changes. We also recognize and appreciate the ongoing collaboration with the Department on this important matter of Safety Code 6 Compliance.

Sincerely,

A handwritten signature in black ink, appearing to read "J.D. Farnes". The signature is fluid and cursive, with a long horizontal stroke at the end.

J. David Farnes
General Manager

Attachment