

October 11, 2022

Christine Volonté
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Spectrum Management Operations Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5
(Submitted by email)

**Subject: Client Procedures Circular (CPC) 2-5-01,
*Licensing Procedure for Global Positioning System (GPS) Active Repeater Stations***

Dear Christine Volonté,

In August 2022, the Department requested the RABC provide comments on proposed amendments to update Client Procedures Circular (CPC) 2-5-01, currently titled *Licensing Procedure for Global Positioning System (GPS) Active Repeater Stations*. The Board assigned the review of the standard a special working group. At the request of the Department, RABC invited members of the Canadian Positioning, Navigation and Timing Board (PNTB) to participate in the RABC review.

The RABC Working Group held one call to review the proposed amendments. Comments were provided to the Department during the review. Many of these comments have been captured in the attached marked-up version of the CPC for greater clarity to the Department.

The Department also invited answers to 2 questions. The RABC responses can be found below.

Question 1: “ISED invites comments on the proposal to expand the scope of the CPC to allow GNSS active repeaters to utilize signals of other global navigation satellite systems.”

Question 1 Response

RABC supports the expansion of the scope of the CPC to GNSS active repeaters. The Board recommends that licenses for GNSS active repeater stations would be issued to public safety agencies only, such as police, fire and emergency medical services, as well as for Department of National Defence agencies.

Question 2: “ISED invites comments on the proposed language regarding interference avoidance and proposed conditions of license.”

Question 2 Response

NAV CANADA has presented cases of loss of GPS experienced in some airports due to active repeater stations. According, RABC strongly supports the inclusion of language regarding interference mitigation and we have recommended the addition of a sentence address EMI issues specific to airports: “Any GPS active repeater installed within a 2-mile (or 3 kilometer) radius of an aerodrome reference point shall be

transmit-interlocked, ceasing transmission whenever an associated large aperture door used for passage of aircraft or vehicles is partially or fully open, if such facility feature exists”.

The Board has now completed its review. The Board recommends the Department publish the revised CPC inclusive of our proposed modifications. We appreciate having had the opportunity to review the updated document.

Sincerely,



J. David Farnes
General Manager

Attachment