

December 6, 2022

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235 Queen Street, 6th Floor
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(Submitted by email)

**Subject: Technical Standards and Requirements for Apparatus Capable of Receiving
Television Broadcasting Signals (BETS-7, Issue 4)**

Dear Josette Gallant,

In September 2022 the Department requested RABC to review to draft Issue 4 of BETS-7, *Technical Standards and Requirements for Apparatus Capable of Receiving Television Broadcasting Signals*. The Board assigned the review to its Broadcasting Committee. At the request of the Department, RABC also posted the consultation on its website to facilitate comments from Canada's World Trade Organization (WTO) partners.

The Broadcasting Committee held one meeting to review the standard. During the meeting, members asked some questions of the Department and provided some initial feedback regarding the standard. Following the meeting, the Department responded to some of the questions raised by RABC and supplied some additional information. The Department also asked RABC to further elaborate on our concerns related to the new section 6.1.1 in BETS-7 draft Issue 4.

RABC members had initially raised concern that the requirement to include analog NTSC receivers in TV sets was being discontinued. The concern is that there are still several analog NTSC transmitters in operation across the country; usually in smaller, remote communities. Consumers in these locations may be disgruntled or confused if they purchase a replacement TV set and it does not include an analog tuner. They will not be able to receive their local over-the-air TV stations.

The Department was asked to follow up on three issues below:

1. Confirm the channel numbering for over the air channels in BTS 3.

2. Determine the number of analog NTSC transmitters in operation in Canada and the US.
3. Determine whether the equivalent FCC regulation in the US requires inclusion of analog NTSC receivers in TV sets.

The Department confirmed that BTS-3 includes the full listing of OTA channels. There are 168 and 593 analog NTSC transmitters in operation in Canada and the US respectively. The FCC does not require that analog NTSC tuners be included in TV sets sold in the US.

The last point above is possibly the most important. There will be a greater benefit to the majority of Canadian consumers if BETS-7 is aligned with the US regulations. Otherwise, there is the risk that a requirement to include NTSC in Canada could have two unintended consequences:

1. Less selection and fewer models available to all consumers.
2. Potential dumping of older model sets in Canada, so less access to the latest technological improvements.

RABC recommends that the requirements related to NTSC tuners should be harmonized with US regulations, which is the case in the current draft. However, in light of the continued presence of licensed analog NTSC television broadcasting stations, the RABC suggests that manufacturers should be encouraged to continue to include NTSC receivers in TV sets for at least five years, if not longer.

In addition to the comments of RABC noted above, we did receive one comment and one request for clarification on the WTO portal. These have been forwarded to the Department for consideration.

RABC has now completed its review of BETS-7, issue 4 and we recommend the Department publish the standard. We appreciate the opportunity to review this important standard.

Sincerely,



J. David Farnes
General Manager