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(Submitted by email)

**Subject: BPR-2, Draft Issue 4**

Dear Josette Gallant,

### **Introduction**

In November 2024, the Department requested that RABC review draft issue 4 of Broadcasting Procedures and Rules BPR-2, – *Application Procedures and Rules for AM Broadcasting Undertakings*. The Board assigned the review of the standard to the Radio Working Group (a subcommittee of the Broadcasting Committee).

The Committee held two meetings to review the proposed changes to the standard, during which feedback was provided to the Department. The Board’s formal comments provided below and in the attachment to this letter. The attachment is a version of the draft BPR that includes specific recommendations, highlighted using tracked changes for ease of reference.

### **Comments**

#### French Language Version of the BPR – Sections 2.4.5 and 2.5.4.2

RABC is of the view that the use of Azimuth does not make sense in the French language. The draft proposed by the Department reads as though there is only one azimuth on the chart.

RABC recommends proposing to modify the title of Sections 2.4.5 and 2.5.4.2 from “Diagramme du champ dans l’azimut” to “Diagramme azimutal du champ”.

The Board further recommends the Department’s proposed changes to the second sentence of section 2.4.5 and the first sentence of section 2.5.4.2 be modified to: “Un diagramme azimutal du champ.” In other words, remove: “dans l’azimut”.

### Section 2.14.1

RABC believes that once a Broadcast Certificate is issued for IBOC operation, the digital operating parameters should have equal protection to the analog parameters and should not be reduced by a subsequent analog application. This is consistent with the current analog rules whereby stations are only protected to their licensed parameters, not the full power for class of station (i.e., "use it or lose it" rule). Once a Broadcast Certificate is issued for IBOC operation, the digital operating parameters should have equal protection to the analog parameters and should not be reduced by a subsequent analog application.

As there is insufficient information to understand the impact of first adjacent skywave interference, RABC recommends that ISED conduct its own studies as was done for Hybrid FM IBOC. Further, RABC encourages ISED to update the Canada/US agreements to protect Canadian assignments.

### Section 2.7.1

In the case of antenna arrays where all towers of equal height, not top loaded, and of the same cross section, a simple uncalibrated moment method model would be sufficient.

### **Conclusion**

At the request of the Department, RABC posted the draft standard on its website to facilitate comments from Canada's World Trade Organization (WTO) partners. Four comments were received via the WTO portal; these were forwarded to the Department for review.

The Board has now completed its review. We appreciate having had the opportunity to review the updated standard.

Sincerely,



J. David Farnes  
General Manager

Attachment