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Josette Gallant  
Senior Director, Terrestrial Engineering and Standards  
Engineering, Planning and Standards Branch  
Innovation, Science and Economic Development Canada  
235 Queen Street, 6<sup>th</sup> Floor  
Ottawa, ON, K1A 0H5  
(Submitted by email)

**Subject: BPR-10, draft issue 3, *Application Procedures and Rules for Digital Television (DTV) Broadcasting Undertakings***

Dear Josette Gallant,

### **Introduction**

In May 2025, the Department requested that RABC review draft issue three of Broadcasting Procedures and Rules (BPR) -10 – *Application Procedures and Rules for Digital Television (DTV) Broadcasting Undertakings*. The Board assigned the review of the standard to the Broadcasting Committee. The Committee held one meeting to review the proposed changes to the standard. The Board’s feedback on the draft standard is detailed below. Included in the feedback are some lingering questions regarding the draft standard.

### **Feedback**

#### 1.0 Scope

RABC is in support of paragraph 2 that operation of ATSC 3.0 is outside the scope of BPR-10.

#### 2.1 Definitions

##### *Allotment*

The link to “DTV Allotment Plans” contained in the draft does not work. RABC recommends that there would be greater clarity in the standard if references to the DTV Allotment Plan would be replaced with the “allotments/assignments in the ISED DTV database”. The actual licenced frequencies may be different than the plan – continuing to reference the plan, rather than licenced frequencies, could be a point of confusion. References to the allotment plan should be replaced or removed throughout the document in favour of referring to the database.

Regarding the database itself, it appears that most DTV stations (if not all?) in the database still have their associated allotment. Going forward, will active stations retain an allotment associated with the parameters of the initial plan, allowing them to increase to these parameters in the future?

RABC proposes the following addition to the last paragraph of the definition of Allotment in the standard:

An up-to-date list of Canadian allotments can be found on ISED's [Spectrum Management System Data](#) webpage. *If an authorized licensee or applicant proposes a change to an allotment, then ISED, in consultation with the user, shall identify which associated allotments shall be retained in the list of Canadian allotments.*

#### *Primary Assignment*

RABC suggests that definitions be added for “regular power station” and “low power station”. Refer to tables 3 and 4 in the standard.

#### *Protected Area*

RABC notes that the distance limitation of 100 km for regular power stations and 20 km for low power stations is present in the current version of BPR-10, Issue 2 February 22, 2016. The protected areas have existed since the first issue of BPR-10.

In response to the Editor's question contained in the draft, we offer the following commentary.

We are led to believe that the distance limitations were established to help build the original DTV allotment plan and then, the revised plan for the 600 MHz transition. It is unclear to RABC why the Department is questioning or reassessing the need for the 100 km and 20 km limits. Perhaps:

- This request came from one or more broadcasters?
- It would simplify the rules and application process?
- It would allow to align with FCC regulations?

CBC/Radio-Canada currently operates 27 DTV services in Canada. 8 of these assignments have distances to its NLBC beyond 100km, and therefore limit their protected contour at 100km instead of at their NLBC contours.

These services are listed below:

1. Vancouver, BC - DTV-E (UHF) CBUT-DT
2. Vancouver, BC - DTV-F (UHF) CBUFT-DT
3. Calgary, AB - DTV-E (UHF) CBRT-DT
4. Ottawa, ON - DTV-E (UHF) CBOT-DT
5. Ottawa, ON - DTV-F (UHF) CBOFT-DT
6. Sherbrooke, QC - DTV-F (VHF) CKSH-DT
7. Québec, QC - DTV-F (UHF) CBVT-DT
8. Saguenay, QC - DTV-F (VHF) CKTV-DT

If the distance limitations were lifted, would the existing station be granted extra protection areas or would it impact only the new or modified stations?

Modifying an existing service protected area could impact the level of interference received, (refers to the Interference Ceilings rules BPR-10 3.6.3). Depending on the situation, increasing the protected area could either result in a reduction or in an increase of the percentage of the population affected by interference coming from another station. CBC/Radio Canada has not undertaken a detailed study to determine if this could have a substantial impact on existing stations but it is expected the impact on existing stations would be somewhat limited.

In reality, the signal levels beyond 100 km are generally too low to be demodulated, considering the ERP levels permitted in BPR-10. Generally, if a received signal is not at least 7 dbµV/m higher than the value of the NLBC, it will not be sufficient to provide a reliable reception.

Currently, CBC/Radio-Canada doesn't have any plan to deploy additional DTV services nor to significantly modify its existing DTV services in Canada.

CBC/Radio-Canada's DTV services aren't expected to be significantly affected whether the 100 km and 20 km limitations are maintained or lifted. Therefore, maintaining the status quo is acceptable, and removing the limits would not pose a problem.

Accordingly, RABC does not believe there is currently a need to change this provision.

#### 2.2.4 Order of Protection for Primary and Secondary Assignments

RABC supports this section.

#### 3.1 Application requirements

BPR-11 allowed for a simplified application process if the proposed station respected its associate allotment, as described in the plan/database. If allotments are retained in the database, and if a broadcaster applies for parameters that are within the ones set for an allotment, could the simplified application process still be used? Or, going forward, will the "regular" application process (including notifications, detailed interference analysis, etc.), need to be followed for all applications?

#### 4.1 Preamble

RABC supports this section and believes that it provides useful context.

#### 4.3.4 Main Body

*Interference Analysis for Mountainous Terrain Locations*

RABC supports the current wording of this section.

### **Conclusion**

In addition, 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. No comments were received on our WTO portal.

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

Sincerely,



J. David Farnes  
General Manager