

October 28, 2025

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

Subject: SRSP-512, draft issue 2, *Technical Requirements for Land Mobile and Fixed Radio Services Operating in the Band 220-222 MHz*

Dear Josette Gallant,

Introduction

In August 2025, the Department requested that RABC review a draft issue of SRSP-512, *Technical Requirements for Land Mobile and Fixed Radio Services Operating in the Band 220-222 MHz*. The Board assigned the review of the standard to the Public Safety Subcommittee. The Subcommittee held two meetings to review the proposed changes to the standard.

The Board's recommended changes to the draft standard are included in the attached marked-up version of the SRSP. Rationale for the recommended changes is provided below.

Rationale

Addition of PTC Channel 102 to Table 5

Positive Train Control (PTC) is a mandatory rail safety system widely deployed across the United States, operating within the 220 MHz frequency band. Among its channels, PTC Channel 102 is the most critical, the specific frequencies are outlined in Table 4 of SRSP-512 Issue 2. This channel serves as a nationwide broadcast frequency and is utilized by all PTC radios in the U.S.

In Canada, PTC Channel 102 is already used in several train yards to test radio communications on U.S.-bound trains prior to departure. Ensuring the availability of this 25 kHz grouped channel within Canada is essential for the rail industry, especially as its usage is expected to increase in the coming years.

Although PTC is not currently deployed in Canada, a similar system—likely to be branded as Enhanced Train Control (ETC)—is anticipated to be regulated by Transport Canada by 2027. While the specific wireless technology for ETC has yet to be selected, there is a strong possibility that some deployments

include the 220 MHz PTC radio ecosystem. If Channel 102 were to be unavailable in certain Canadian regions, it could pose significant challenges, as locomotives cannot be reprogrammed to use alternative broadcast channels in specific areas.

Addition of PTC Channels 113 and 125 to Table 5

Due to heavy usage of Channel 102 in parts of the U.S., two additional nationwide common channels—PTC Channels 113 and 125—are planned for deployment. However, these channels are designated as U.S. primary near the Mexico border but as secondary near the Canadian border. This classification limits their use for nationwide operations in the U.S., as Canadian licensees expecting protection from interference could potentially restrict PTC transmissions. Such restrictions could have widespread implications, potentially requiring reprogramming of approximately 20,000 locomotive radios.

Conclusion

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

Sincerely,

A handwritten signature in black ink, appearing to read "J. D. Farnes", with a stylized flourish at the end.

J. David Farnes
General Manager

Attachment