

December 23, 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: BETS-6, Draft Issue 3 – *Technical Standards and Requirements for FM Broadcasting Transmitters*

Dear Josette Gallant,

In October 2025, the Department requested that RABC review a draft new issue of BETS-6 – *Technical Standards and Requirements for FM Broadcasting Transmitters*. The Board assigned the review of the standard to the Radio Working Group (a subcommittee of RABC’s Broadcasting Committee). The working group held one meeting to review the proposed changes to the standard.

Two minor concerns were identified with the wording of Section 7 of the standard.

First, in section 7.3.2, The word ‘above’ is potentially confusing. While RABC understands the spirit of the requirement, to be accurate the word should be rewritten as indicated below:

7.3.2 Method of measurement

The transmitting equipment shall be operated using the standard test load at rated power. The carrier shall be modulated with the standard test input signal at 100% modulation. Using a sampling device, measure all spurious emissions up to the tenth harmonic of the carrier frequency.

The voltage of the emission shall be measured with a frequency selective instrument. The attenuation versus frequency characteristics of the power sampling device and the load used in this test shall be known over the range of frequencies involved. Record the attenuation (in dB relative to rated power) of all spurious emissions, except those that are attenuated by ~~more than~~ 20 dB ~~above~~ **more than** the minimum required values listed in section 7.3.3.

Second, in the table in section 7.3.3, the column header “Minimum Attenuation (dB) (relative to the power level of the unmodulated carrier)”, would be clearer if “dB” was replaced with “dBc”.

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,

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

J. David Farnes
General Manager