



January 22, 2026

Josette Gallant
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(Submitted by email - consultationradiostandards-consultationnormesradio@ised-isde.gc.ca)

Subject: SMSE-010-25 - Consultation on the Policy, Technical and Licensing Framework for the VHF Maritime Frequency Bands

Dear Josette Gallant,

Please find attached the RABC response to the above noted consultation. The Board has responded to Questions 4, 5 and 6.

The response was sent to RABC Sponsor Members for ballot. Of the Board's 20 Sponsor Members, 10 approved the submission and 7 abstained.

We appreciate having had the opportunity to provide comments to this important consultation.

Sincerely,

A handwritten signature in black ink that reads "J. D. Farnes".

J. David Farnes
General Manager

Attachment

Attachment

RABC Response to SMSE-010-25

Question 4: ISED is seeking comments on the proposal to not accept licensing applications for new non-maritime systems in VDE bands.

In order to promote spectrum efficiency and flexibility within Canada, the RABC proposes that licence applications still be considered on a case-by-case basis for non-maritime uses in the VDE bands. These licence applications would be considered based on their proximity to maritime and licensed public-safety licensees.

The Board further recommends that applications for new non-Maritime systems in the VDE bands shall be permitted if the proposed system operates with a digitally modulated emission and with the understanding that new non-Maritime system will operate on a non-interfering basis to VDE maritime systems. The recommendation supports spectrum efficiency by permitting both public safety and industrial/enterprise entities continued access to VDE channels on a non-interference basis to VDE operations. The spectrum would be available for use throughout Canada both on navigable waterways for VDE systems and in geographic areas where there is limited risk of interference to VDE systems.

Question 5: ISED is seeking comments on allowing existing non-maritime licensees to continue to operate on a NINP basis vis-à-vis maritime VDE terrestrial systems.

For the reasons identified in the response to Question 4, the RABC recommends that non-maritime incumbent licensees, both industrial, enterprise and public safety entities, should be permitted to continue to operate on a non-interfering basis to VDE maritime systems. This approach will support efficient use of the VDE spectrum as it will continue to be available throughout Canada for use by current non-maritime licensees with the understanding that VDE operations are to be protected from harmful interference. Further, VHF spectrum characteristics benefit users whose operations are located in the more rugged geographic areas of Canada.

Question 6: ISED is seeking comments on protecting existing non-maritime public safety systems until January 1, 2035. After this date, these systems will operate on a NINP basis.

In providing comments, respondents are requested to include supporting arguments and rationale. Further, respondents are requested to take the Canadian context into consideration in their response.

Existing non-maritime public safety systems should not be on a 10-year clock to have their status changed to non-interference/not protected (NI/NP) but should instead remain in protected status until real-world operations demonstrate incompatibility. Downgrading the status of existing LMR licenses, particularly the “larger provincial systems” identified by ISED, creates an

unnecessary risk to operational performance and effective public safety response based on a 10-year forecast of VDES deployment of VDES that may turn out to be premature.

ISED's analysis indicates that the majority of existing LMR licensees – public safety related as well as industrial and enterprise entities - operating in proximity to maritime services in the VDE bands can generally continue to operate. Such an operational environment supports continuing the status of existing systems as primary with interference situations resolved on a case-by-case basis as opposed to a blanket reduction in priority. The threat of a change of status will result in licenses, including provincial public safety systems, to consider the expenditure of funds to relocate the spectrum that may not be as suitable as the VHF bands and based on ISED's analysis, may be unnecessary.

The RABC would support the case-by-case review with public safety licensees prior to this proposed sunset date to determine the potential impact and to determine if protection was still required. The Board also suggests that, in the case of larger provincial / federal systems, rather than transitioning to other frequencies, that opportunity for frequency re-assignment, re-configuration, or re-allocation within these systems be evaluated to maintain protected operations and not interfere with the maritime use of the VDE bands.