

Revision to the Proposed Client-Based Safety Code 6 Reporting Program

To ensure that all antenna installations comply with Safety Code 6 at all times, Innovation, Science and Economic Development (ISED) conducts regular audits. Antenna system operators also have an important role to play in ensuring ongoing SC6 compliance of their installations.

Through discussions with the RABC Safety Code 6 External Reporting Program Working Group, the following plan is proposed to complement the Department's effort to ensure ongoing compliance.

Broadcasting Operators

Current Requirements

- Safety Code 6 (SC6) analyses are submitted as part of the engineering brief in support of an application for a new certificate or a change of facilities.
- Where the RF levels are greater than or equal to 50% of the SC6 limits for uncontrolled environments at locations accessible to the general public, operators are required to notify ISED and demonstrate compliance.
- Operators are required to ensure their installations comply with SC6 at all times.
- At any given time, the Department may request operators to provide detailed SC6 compliance information for individual installations. Responses are expected within five days.

Proposed Requirements

The current requirements will continue in addition to the following.

Typical scenario

To demonstrate continued compliance, a complete Safety Code 6 analysis will be required as part of the broadcasting certificate renewal process – typically every 7 years. The analysis must:

- Meet the [GL-08 requirements](#); and
- Include a site plan clearly showing access control mechanisms, when they are required.
 - Where access control mechanisms are not required to ensure compliance with Safety Code 6, a site plan is not mandatory.

Stand-alone low-power stations

To demonstrate continued compliance, as per [Section 8.4 of BPR-1](#), operators of low-power stations shall only attest that the general public cannot access the area surrounding the antenna delimited by the distance given in [Annex C](#).

Installations where no changes were made

When no changes have been made to a station and its RF environment (i.e. broadcasting stations within 1 km and non-broadcast facilities within 100 m), a Safety Code 6 attestation will be accepted by the

Department. The attestation must be attached by a previous GL-08 compliant Safety Code 6 assessment that has been prepared as per the Safety Code 6 (2015) limits.

Proposed Process

First year

- In April, letters will be sent to all certificate holders whose certificates are expiring in August 2017 requesting a complete Safety Code 6 analysis meeting the GL-08 requirements and including a site plan showing access control mechanisms.
- Operators are to provide the required information prior to July 31, 2017.

Following years

- In the fall, the Department will be sending renewal letters to all certificate holders whose certificates will expire in August of the following year.
- Responses including the Safety Code 6 analyses (calculations or measurements) will be expected in February.

Telecommunication Carriers

Rapid growth of the wireless communication industry is resulting in an increasing number of antenna installations as well as the proliferation of wireless devices, such as smartphones, tablets, Wi-Fi routers, etc. This growth is expected to continue with the implementation of 5G services. As a result, continued vigilance with regard to compliance with Safety Code 6 (SC6) is warranted.

Current Requirements

- Where the RF levels are greater than or equal to 50% of the SC6 limits for uncontrolled environments at locations accessible to the general public, operators are required to notify ISED and demonstrate compliance.
- Operators are required to ensure their installations comply with SC6 at all times.
- At any given time, the Department may request operators to provide detailed SC6 compliance information for individual installations. Responses are expected within five days.

Proposed Requirements

The current requirements will continue in addition to the following:

- On an annual basis, each carrier will submit the percentage of Safety Code 6 (RF levels from calculations or measurements) of 10 % of their total installations. The sample should be distributed evenly amongst the following categories:
 - Antennas on rooftops;
 - Antenna supporting structures below 10m;
 - Antenna supporting structures between 10 – 15m; and
 - Antenna supporting structures between 15 – 25m.

Note: If there are not enough installations to be distributed evenly amongst the four categories to reach 10% of the total installations, operators are to include all the installations with lower structures height (below 10m), followed by a higher percentage structures between 10 – 15m, 15 – 25m and rooftops to the degree necessary to satisfy the 10%.

- In addition, each carrier must submit, one “worst-case” scenario analysis (representing a fully loaded installation with all frequencies available to the carrier) for a 25m – 50m tower, and one for a 50m tower.
- The data collected will be documented separately in an Excel spreadsheet using a template provided by the Department.

Proposed Process

- In April, letters will be sent to operators requesting SC6 information (RF levels – percentage only and description of access control mechanisms).
- For 2017, responses are to be filed by September.
- For subsequent years, responses will be expected in July.
- ISED will review the information provided and select certain sites for further verification by requesting the calculations or measurement report, site plan, including access control measures as appropriate.
- In subsequent years, ISED may adapt the client-based Safety Code 6 reporting program (e.g. adjusting the number of rooftops versus towers) based on the results and information received.