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(via email : david@rabc-cccr.ca)

J. David Farnes
General Manager
Radio Advisory Board Canada

Subject: Ballot Response to ISED Client-Based Safety Code 6 Reporting Program

CBC/Radio-Canada **approves with comments** the proposed Reporting Program.

(1) First of all, CBC/Radio-Canada agrees with Innovation, Science and Economic Development Canada (ISED) that the public must be protected at all times and thus, exposed to NIR levels that meet the limits set out in Safety Code 6. CBC/Radio-Canada hereby reiterates its formal commitment to ensure that all its facilities across the country fully comply with Safety Code 6 at all times. This is a strict requirement that we take very seriously.

(2) In this regard, we have demonstrated over the years that whenever a potentially problematic situation has been brought to our attention, we have always acted promptly to implement remedial measures. Whether it was with a power reduction, fencing or a modification to the antenna system, CBC/Radio-Canada has always taken action to comply with current standards.

(3) Following the publication of the latest version of Safety Code 6, CBC/Radio-Canada has provided an attestation indicating that all its transmitting facilities were in compliance with the revised limits. Also, note that only 30 of the 527 CBC/Radio-Canada's transmission sites across the country had levels between 50% and 100% of SC6 in areas accessible by the general public.

(4) The proposed Client-Based Safety Code 6 Reporting Program states that a complete Safety Code 6 analysis will be required as part of the broadcasting certificate renewal process. We note that the proposed program allows some flexibility since it would permit two exemptions to this requirement. In the following cases, only an attestation of conformity would be sufficient:

- Stand-alone low-power stations, if they comply with Appendix C of BPR-1.
- Installations where no changes were made and a complete report (GL-08) is already available.

(5) Despite these exemption criteria, CBC/Radio-Canada has assessed the workload related to the proposed program for its services and it will represent a total of 698 distinct reports, spread over the next 7 years, but 458 of them will be required in 2022! It goes without saying that the additional workload related to the proposed program will be considerable for the CBC/Radio-Canada.

(6) In view of the above, we would like to take this opportunity to highlight a technical concern with regards to carrying out the required analyses of the Reporting Program. The antenna patterns of transmission systems used by Public Safety organisms, as well as radiocommunication and telecommunication systems must be known in order to accurately calculate NIR levels. Unfortunately, this information is currently missing from ISED's Spectrum Management System. With up-to-date and reliable technical information, we can provide better and more accurate SC6 evaluations and also, we can complete them more efficiently.

- **We kindly ask ISED to open dialogue with the industry to try to figure out on how engineers could fulfill their obligation on SC6 calculations if antenna patterns are unknown / not available. One of the possibilities could be that ISED would require all licensees to provide the detailed information on their antenna patterns (in tabulated format) in order to make it publicly available.**

(7) We remain absolutely open to discussion, the intent is simply to find a solution in order to work efficiently and perform accurate SC6 assessments. Gathering the missing information on a case-by-case basis is currently extremely time-consuming. Thus, we believe this information related to all the systems in Canada should be available online. Once again, we believe that such information is crucial in order to calculate NIR levels precisely.

(8) Finally, although ISED did not explicitly include such a mention in its proposition document, we consider that calculations related to NIR safety levels should be carried out under the responsible supervision of professional engineers who shall certify the adequacy of their analysis by affixing their signature and stamp.

Best regards,

Julie Bergeron, P.Eng.
Spectrum Engineering
CBC/Radio-Canada Transmission
Tel.: (514) 597-3894

Charles Rousseau, P.Eng.
Spectrum Engineering
CBC/Radio-Canada Transmission
Tel.: (514) 597-6035