

May 1, 2017

Ms. Lynne Fancy
Senior Director, Spectrum Management Operation
Spectrum, Information Technologies and Telecommunications Sector,
Innovation, Science and Economic Development Canada
(Submitted by email)

Dear Ms. Fancy,

Re: Proposed Client-Based Safety Code 6 Reporting Program

In June of 2016 the Radio Advisory Board of Canada received a request from the Department to create a working group to review the Department's proposed Client-Based Safety Code 6 Reporting Program. The Board agreed with the request and quickly established a working group consisting primarily of broadcasters and mobile operators. Several conference calls were held to review the proposal. Working group members provided comment on the proposal and submitted recommended changes to the document.

The final call of the working group took place in March of 2017, following which working group members submitted their final comments and recommended changes regarding the proposal. On April 13, 2017, the Department provided the final version of its proposal together with a spreadsheet template detailing the information that would be requested of mobile operators. The RABC would note that not all the recommended changes to the proposal that were made by the working group members have been accepted by the Department.

Further, a difference of opinion was expressed by some contributors whether the information available on the Department's web site includes sufficient detail for spectrum users to efficiently and accurately fulfill their obligations under the proposed Reporting Program. In this regard, the RABC suggests that the Department remain open to further refinement of the Reporting Program as experienced is gained.

The Department has also requested that the proposed reporting program be sent to RABC Sponsor Members for ballot. Normally the Board sends its responses (to consultations) to members for ballot. In this case, members were provided with the Department's proposal with the understanding that the RABC has contributed to and supports the Proposed Client-Based Safety Code 6 Reporting Program.

The April 13, 2017 version of the Department's proposal was balloted to Board members. Twelve of the RABC's twenty-one members responded as follows: 8 approved, 2 approved with comment, 1 disapproved with comment and 1 abstained.

The Sponsor Members' comments (which form an integral part of the RABC's response) are as follows:

Canadian Association of Broadcast Consultants

ISED should strive to ensure the accuracy of the database as available through SMS. Vertical radiation patterns of non-broadcast systems would be helpful in the accurate analysis of the Safety Code 6 levels at a site.

CBC/Radio Canada

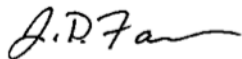
Please see attached.

Royal Canadian Mounted Police

*Royal Canadian Mounted Police (RCMP) operates mobile radios in police vehicles and base stations in police detachments. In some occasions, RCMP employees install Radio antennas on tower structures. **For each individual installation, RCMP ensures the installation complies with SC6 at all times to fulfill the current SC6 reporting requirement**, and RCMP ensures proper training provided to its employees to perform the tasks. RCMP is obligated to be compliant with Canada Labor Code and federal laws and regulations. The proposed additional requirements are duplication of current effort for RCMP, and it will increase RCMP operating cost to fulfil the additional requirements. RCMP would have supported the proposal with an exemption clause to exclude Public Safety Agencies who have been mandated to be compliant with Canada Labor Code and federal laws and regulations.*

The Board appreciates the opportunity to respond to this important notice.

Sincerely,



J. David Farnes
General Manager

Attachment (CBC/Radio Canada comment)