

February 5, 2021

Ms. Josette Gallant
Director, Regulatory Standards
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5
(Submitted by email)

Re: RSS-182, Issue 6 – Maritime Radio Equipment Operating in the Band 156-162.5 MHz

Dear Ms. Gallant,

In November 2020, the Department requested the RABC review proposed updates to RSS-182, *Maritime Radio Equipment Operating in the Band 156-162.5 MHz*. The Department also requested the consultation be posted to the RABC website in order to facilitate the receipt of comments from WTO members.

The Board assigned the review of RSS-182 to the RABC Mobile and Personal Communications Committee (M&PCC). The Committee held one call to review the initial draft of the procedure document. There were roughly fifteen stakeholders represented on the M&PCC call, including guest participation from the Canadian Coast Guard and Transport Canada.

A number of comments and questions were provided to the Department during the call. These included:

- Use of the term ‘radiotelephone’, as opposed to a more modern term reflecting that most devices using the band are not telephones
- Add text to Section 5 regarding the ability to apply on a case-by-case basis for equipment that may not conform to the limits of Section 5.6 (transmitter power)
- Clarify the text in Section 5.4(b) related to the use of FM or PM
- Verify the maximum transmitter output levels in Section 5.6 are consistent and harmonized with other jurisdictions
- Ensure that the manufacturers’ minimum specifications for devices will not automatically exceed the proposed power limits (since manufacturers guarantee their devices will meet the minimum specifications, the devices may actually operate in excess of the minimum).

Upon consideration of the comments raised during the RABC call, the Department provided an updated draft of the proposed standard. The revised draft was circulated to RABC members and invited guests for additional comment. No further comments were received by RABC.

The Board also received three comments via the WTO Portal on its website. These comments were forwarded to the Department for consideration.

The Board has completed its review and is satisfied with the updates proposed to RSS-182, Issue 6 (Draft v2 January 2021). We appreciate having had the opportunity to review the updated standard.

Sincerely,



J. David Farnes
General Manager