

June 22, 2017

Stephanie Price, P.Eng., CAE
Engineers Canada
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Ottawa, ON
K1P 6L5

(sent by email: executive.office@engineerscanada.ca)

Dear Ms. Price,

The Radio Advisory Board of Canada (RABC) is an “association of associations” representing most sectors of the radio-communications business in Canada which provides broadly based, unbiased and technically expert advice to the Government of Canada and to the industry on all matters regarding the management and use of the radio frequency spectrum in Canada.

We are writing to request the opinion of Engineers Canada regarding whether certain measurements and reports that Canadian Broadcasters must submit to Innovation, Science and Economic Development Canada (ISED), need to be carried out under the responsible supervision of a professional engineer. The measurements and reports deal specifically with Exposure to Radio Frequency (RF) Energy.

ISED provides the following as part of its Broadcasting Procedures and Rules the following (reference to BPR-1 Issue 7, February 2016, “General Rules”, which continues to be in force today and can be found at <http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf01326.html>):

1.1 Procedure for Submission by Qualified Personnel

Planning and design of new broadcasting undertakings, changes to existing systems, as well as the preparation of engineering briefs submitted in support of applications for designs or design changes, constitute the practice of professional engineering. It is the responsibility of the person signing the submission to comply with appropriate provincial legislation insofar as the practice of professional engineering is concerned.

ISED requires that the design of a proposed system or proposed changes to an existing system be carried out under the responsible supervision of a professional

engineer who shall certify the adequacy of the design by affixing his/her signature and stamp to the engineering brief when this brief is sent to the Department in paper format. A signed electronic version of the engineering brief in PDF format can also be sent to the Department with the application.

BPR-1 also has a section dealing with RF Exposure:

2.2 Exposure to Radio Frequency (RF) Energy

As outlined in Client Procedures Circular CPC-2-0-03, it is the responsibility of proponents and/or operators of installations to ensure that all radiocommunication and broadcasting antenna systems comply with Health Canada's Safety Code 6 (SC6) guidelines entitled Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz to assure the protection of the general public at all times. To this end and in addition to relevant requirements set forth in CPC-2-0-03, the engineering brief submitted in support of an application for a broadcasting certificate shall contain an analysis of the RF exposure levels produced by the new or modified transmitting facility. Details of the RF exposure evaluation procedure are given in Section 8 of this document.

Given that engineering brief documents must be certified by a professional engineer, RABC Broadcasting members understand and agree that the analysis of RF exposure levels must also be certified by a professional engineer.

Recently, ISED consulted with the RABC regarding a new ISED Proposed Client-Based Safety Code 6 Reporting Program (ISED's document can be downloaded from the RABC website:

<http://www.rabc-cccr.ca/ised-proposed-client-based-safety-code-6-reporting-program/>)

The new reporting program places new requirements on Broadcasters, however it is silent on the qualifications required of the individuals conducting analysis of RF exposure levels.

The new reporting program references another ISED guideline - *Guidelines for the Preparation of Radio Frequency (RF) Exposure Compliance Reports for Radiocommunication and Broadcasting Antenna Systems*, GL-08 Issue 1 November 2010

(<http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf09945.html>). GL-08 is also silent on the qualifications of personnel (although it does include a general reference to BPR-1). However, and importantly, Section 3.4 of GL-08 specifically states that "A clear compliance statement should conclude every report"; with an example of a declaration of compliance being provided in Annex A of the document.

RABC Broadcasting members believe ISED should state clearly in its guideline documents and regulations that analysis and attestation of RF exposure levels must be certified by professional Canadian engineers. Our view is informed by the opinions of professional engineers who

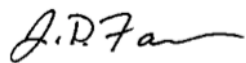
currently perform this analysis for Broadcasters as well as the opinions of the Broadcasters themselves.

We are hereby requesting an opinion from Engineers Canada regarding our conclusion that ISED should reinforce in its GL-08 guidelines that such analysis of RF exposure must be certified by professional Canadian engineers.

We realize the burden of our question; however, we would very much value your opinion. We will most certainly make our experts available to provide you with additional information and to answer any questions you may have. Indeed, a conversation between our experts and the appropriate individuals within Engineers Canada could be very fruitful.

Thank you for considering this request.

Sincerely,



J. David Farnes
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