July 23, 2013

Manager, Radio Equipment Standards
Industry Canada
19th Floor, 300 Slater Street
Ottawa, Ontario, K1A 0C8

Dear Sir.

Canada Gazette Notice SMSE-001-13, Radio Amateurs of Canada Comments regarding the Release of Issue 1, RSS-244,

Radio Amateur of Canada (RAC) is the National Organization representing the interests of the amateur radio community in Canada. RAC is pleased with the opportunity to provide comments following the release of Radio Standards Specification 244, Issue 1, Medical Devices Operating in the Band 413 to 457 MHz.

As Department officials are well aware, the frequency range of spectrum that has been allocated for these new medical devices is shared with incumbent radio services that include mobile, fixed, radiolocation as well as the Amateur Service. Specifically, the Amateur Service is allocated secondary status in the range 430 to 450 MHz and is largely used for FM and digital mobile communications involving portable, mobile and fixed repeater stations. The band is well suited for localized communications by volunteer amateur radio operators providing assistance during disaster relief operations.

RAC recognizes that Industry Canada has harmonized the authorization of the same spectrum for these medical devices as the FCC in the USA. RAC also recognizes and has the same concern as voiced by our counterpart in the United States, the American Radio Relay League as well as the US land mobile communications industry about potential interference between RSS 244 certified medical devices and mobile communications radios sharing the same frequency band. In particular, RAC is concerned about the potential of harmful interference to these medical devices from UHF handheld portable equipment as well as similar equipment operating in the land mobile service by Police and EMS personnel. Although we are aware of the claims of developers that their technology has a high degree of interference tolerance, we still question its ability to function properly on any of its dynamically selected UHF allocations when operating in the presence of very strong fields from in-band portable radios being used and transmitting in close proximity to a patient with implanted RSS 244 devices.

We believe that more appropriate spectrum for these devices would be an allocation of a channel or two of UHF TV broadcast spectrum especially at this time when the Department is engaged in the re-purposing of the broadcast channels for TV White Space devices.

Please note that we have also made our concerns known to the Department along with colleagues from Police and EMS organizations by way of our participation in the Radio Advisory Board of Canada.
We will follow with interest the state of approval of these wireless medical devices by Health Canada and if approved, Radio Amateurs of Canada will advise our membership to be aware and report any interference suspected between RSS 244 devices and the use of amateur equipment occupying the same shared spectrum.

Yours Sincerely,

Geoff Bawden
President, Radio Amateurs of Canada.
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