



Canadian
Association of
Broadcasters

L'Association
canadienne des
radiodiffuseurs

December 6, 2007

Via Email:

mccaughern.bob@ic.gc.ca

Mr. Robert McCaughern
Director General
Spectrum Engineering Branch
Industry Canada
300 Slater Street
Ottawa ON K1A 0C8

Dear Mr. McCaughern:

At the 24 October 2007 meeting of BTAC Subcommittee 22, broadcast industry participants were informed by your staff that the Department wishes to be prepared as early as December to gazette amendments to the *Broadcasting Procedures and Rules, Part 3 (BPR-3)*, permitting permanent HD Radio IBOC DRB operations in the FM broadcasting band.

CAB radio members who have been participating in this subcommittee believe that there is insufficient technical evidence in hand to justify making such amendments at this time. Specifically, broadcasters are not convinced that there has been adequate field experimentation with HD Radio, operating in the Canadian FM radio environment, to warrant the issuance of regulatory amendments that would enable the granting of permanent IBOC authorizations to FM broadcasters.

The broadcasters' principal concern has to do with the potential interference that the digital carriers of an HD Radio IBOC service may cause to the reception of analog FM stations operating in nearby markets on first adjacent frequencies. Evidence of the validity of these concerns is provided in technical reports issued last year by CBC Engineering and the Digital Radio Co-ordinating Group (DRCG), both of which have been provided previously to the Department¹.

¹ See "*IBOC Technology: An Assessment of Technical & Operational Issues in the Canadian FM Radio Environment*", Digital Radio Co-ordinating Group, 24 May 2007;

These conclusions are based upon the results of both lab and field tests, conducted in the Toronto/Niagara area in 2006, which have been the only experiments with HD Radio conducted in Canada to date.

Recognizing that there is both an industry and government interest in determining whether IBOC technology can play an effective role in providing digital radio services to Canadian radio listeners, the CBC and DRCG have called for further field and lab experimentation on the issue of adjacent-channel interference prior to the issuance of any permanent IBOC authorizations by the Department. Private broadcasters agree with this approach and were pleased to see the publication of *Canada Gazette* Notice SMBR-01-07, which allows FM licensees to file applications for experimental hybrid IBOC operations.

The provisions that have been made in the Notice for modifying or terminating IBOC experiments that cause harmful interference to other stations are acceptable to broadcasters. However, it had been our understanding that permanent amendments would not be made to BPR-3 until such time as more data has been made available with respect to the interference issues. This is evidenced by the reference in SMBR-00107 to follow-up action, where the Notice states:

“Should these experiments prove successful, Industry Canada will work with the public and private broadcasting industry to develop the required technical regulations in order to accommodate hybrid digital radio on a more permanent basis.”

Considering this, the CAB requests that the Department not proceed with amendments to BPR-3 until additional experimental IBOC operations have been authorized and there has been a reasonable opportunity for all concerned to further assess IBOC's interference impact within the protected service areas of technically-related analog FM stations. This position has been taken because of the concern that once permanent IBOC operations are authorized, even if only on a “provisional” basis, licensees and the listening public will expect that the new digital services will not be terminated or reduced. This will especially be the case for broadcasters who have made the capital investments required to implement permanent IBOC facilities.

See also, “*IBOC Field and Lab Trial Results from Toronto, ON*”, CBC Report ER-0605, March 2007

Considering the time it will take for the CRTC and the Department to conclude their respective on-going reviews of DRB licensing and spectrum-use policies, it would not seem that delaying permanent IBOC amendments to BPR-3 would have any negative consequences. Indeed, this would provide sufficient time to properly assess the compatibility of this technology with the Canadian FM radio environment and ensure that a suitable role for IBOC in the overall national digital radio policy is identified.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Pierre-Louis Smith', with a large, stylized initial 'P' and 'S'.

Pierre-Louis Smith
Vice-President, Policy and Chief Regulatory Officer

c.c. Mr. Vassilios Mimis, Industry Canada (BTAC Chairman)
Mr. Ray Carnovale, V-P Engineering and CTO, CBC/Radio-Canada
Mr. Gerald Bergin, Manager, Broadcast Technology, CRTC