

Comments from NTRC – Commonwealth of Dominica

13th August 2021

1. Community Radio Allotment in the FM Broadcast Band: 88.0 - 108.0 MHz (as relates to Foot Note E.3)

1.6 MHz is allotted for Community Radio in the lower portion of the FM Band; however, Dominica needs more spectrum in other areas of the FM Band because of the level of occupancy of the French FM stations and the grandfathered FM assignments that were established in the “Community Radio” segment of the FM Band, before the inception of NTRC/ECTEL and appear to be unchangeable because of ownership and cost. Hence, 1.6 MHz should be allotted for Community Radio in the center and upper portion of the FM Band as well.

Additionally, it should be noted that the Maximum Power Limit pursuant to ECTEL’s final recommendation and prescribed licence template is 10 Watts. A clause could be added to indicate that notwithstanding, there may be exceptions where the limit could be more to compensate for the challenge with the terrain of the intended coverage area.

2. Much Needed Studio to Transmitter Links (STLs) Allotment in the 200 MHz to 220 MHz Band (as relates to Foot Note E.4)

We would like to recommend that a 20 MHz allotment be made for Studio to Transmitter Links (STLs) from 200 MHz to 220 MHz to compliment the 335 MHz - 399.9 MHz Band noted in E.5. Because of the terrain, some stations have a difficulty utilising the higher frequency band of 335 MHz - 399.9 MHz. Thus, we are making an appeal for an additional allotment for FM Broadcast STLs in the lower frequency band where the signal will definitely propagate more efficiently in areas where the terrain is challenging, as is the case in some parts of Dominica and other ECTEL Member States. As a matter of fact, most of the STL manufacturers currently manufacture STLs in the 200 - 220 MHz band. Moreover, a STL in the 200 - 220 MHz range have been tried and proven between Portsmouth and Marigot in the north of Dominica. Such STL assignments are diffinitely required in some of our Member States.

3. Inclusion of weather channel frequencies in VHF Land Mobile / Marine Band Plan: 148.0 - 174.0 MHz (as relates to Foot Note E.12)

- a. A specific VHF allotment for weather channel frequencies should be designated in this segment of our spectrum plan. Considering the situation with climate change, it is time we cater for and encourage the establishment of VHF weather broadcast in the ECTEL Member States, particularly for fishermen an persons at sea. We

recommend **four (4)** of the listed NOAA Weather Radio stations broadcast frequencies in the VHF “Public Service band”: 162.400 MHz, 162.425 MHz, 162.450 MHz, 162.475 MHz, 162.500 MHz, 162.525 MHz, or 162.550 MHz.

- b. Additionally, there should be a review of these VHF sub-bands to confirm harmonised consensus. It would be good to confirm the appropriateness of these allotted sub-bands, particularly for the Police and emergency agencies assignments.

4. Inclusion of weather channel frequencies in UHF Family Radio Service Band Plan: 462.5625-467.7125 MHz (as relates to Foot Note E.7).

A specific UHF allotment for weather channel frequencies should be designated in this segment of our spectrum plan. Considering the situation with climate change, it is time we cater for and encourage the establishment of UHF weather broadcast in the ECTEL Member States, particularly for persons at work and home using the Family Radio Service. These radios are getting very popular and widely used currently. We recommend **four (4)** UHF “Family Radio Service” frequencies: 462.5750 MHz (Ch. 16), 462.6000 MHz (Ch. 17), 462.6250 MHz (Ch. 18) and 462.6500 MHz (Ch. 19).

- 5. ECTEL’s 700 MHz Band Plan, as relates to Foot Note E.14, should be updated with current TDD schemes.**
- 6. Allotment(s) for drones should be designated in the updated spectrum plan; possibly with FCC's / ITU's Region 2 standards.**

Looking forward to comment on the comments.

Regards,



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