



**Dave Goodwin, VE3KG**  
Regulatory Affairs Officer  
regulatory@rac.ca

# THE REGULATORY ROUNDUP

Topic: Update on RAC initiatives, Tactical and Club Call Signs, Club and Over The Horizon Radar

In the "Regulatory Roundup" column in each issue of *The Canadian Amateur* magazine, I will provide an overview of our regulatory priorities and also discuss some topics of interest.

## Update on RAC Initiatives with ISED

As mentioned in my last column representatives of Radio Amateurs of Canada and Innovation Science and Economic Development Canada (ISED) met for the annual Canadian Amateur Radio Advisory Board (CARAB) meeting on Monday, September 8.

CARAB is the formal meeting where RAC and ISED establish priorities for the coming year and discuss matters of mutual concern.

At the meeting we discussed the following three outstanding requests for changes to ISED policy.

- Call sign policy
- Wider access to remotely controlled stations
- Update to the Question Bank for the Advanced exam

Progress on all three have been affected by a shortage of staff at ISED. This has been made worse by some projected cuts to the federal public service in the November 2025 federal budget.

RAC's request for changes to call sign policy is our top regulatory priority. There are two impediments: information technology (IT) resources in ISED are scarce; and ISED may decide that public consultation is required before RAC's recommendations can be implemented.

RAC has offered to shoulder some of the administrative burden of our proposals, but ISED is not yet able to move forward because of their resource constraints.

ISED has indicated they are willing to expand access to remotely-controlled stations beyond just Advanced Amateurs, but their likely course of action is nuanced.

A decision will not be final until a new version of policy document "RIC-3: Information on the Amateur Radio Service" is released. Again, resource constraints are holding up progress on this matter.

ISED has "paused" work to review and approve RAC's recommendations for changes to the Advanced Question Bank. RAC provided comprehensive, detailed recommendations for change early in 2025.

Our recommendations must be reviewed and approved by qualified technical personnel and by ISED's publications team. So far ISED has not been able to find staff to do this.

The changes RAC has recommended will require modifications to three of the 50 subjects of the Advanced exam as they appear in RIC-3. Because ISED prefers to make its update to RIC-3 comprehensive, the changes to remotes and the changes to the Advanced exam will be approved together.

The bottom line is that we are waiting as fast as we can. In my role as RAC's principal contact with ISED, I must find a balance. I must be annoying enough to ISED that they are motivated to find the resources to complete these projects as swiftly as possible. However, I cannot be so annoying as to alienate them and cause them to shut down our proposals.

There is goodwill towards the Amateur Radio Service in ISED, but they are strapped for resources. We must be patient.

### Tactical Call Signs

A Radio Amateur in Alberta recently asked about Amateurs' use of "tactical call signs" when we deploy for public service events.

A tactical call sign is something like "Check Point 7" or "Delta" or "Net Control" – something that identifies the function or location of a station in a net.

Tactical call signs are very useful tools. However, we cannot substitute a tactical call sign for our regular, ISED-issued Amateur Radio call sign.

We have a regulatory and policy obligation to identify with our assigned call signs. This applies even during public service events when tactical call signs make a lot of sense.

Section 41 of the *Radiocommunication Regulations* states:

**41** – *The holder of a radio licence shall identify the radio station in respect of which the licence was issued in accordance with the Technical Requirements Respecting Identification of Radio Stations, issued by the Minister, as amended from time to time.*

The "Technical Requirements Respecting Identification of Radio Stations" is Ministerial direction, also known as "RBR-3", which you can find at:

<https://ised-isde.canada.ca/site/spectrum-management-telecommunications/sites/default/files/attachments/2022/rbr3e.pdf>

Section 2 of that very short document is quite clear:

**2 – Identification:** *The operator of each radio station communicating with other radio stations shall transmit the assigned call sign at least once in each transmission and at least once every 30 minutes of transmission. If no call sign has been assigned, the name of the licensee of the radio station will be used.*

Note that this is the requirement for stations in all radio services, not just Amateur Radio.

For Amateur Radio, ISED has provided elaboration in the following questions from the Basic Question Bank, updated on August 26, 2025. You can find this at: [https://apc-cap.ic.gc.ca/datafiles/amateur\\_basic\\_questions\\_en.pdf](https://apc-cap.ic.gc.ca/datafiles/amateur_basic_questions_en.pdf)

**Section B-001-013** of the Basic Question Bank has 11 possible questions on “station identification, call signs, prefixes”. Seven of those 11 questions deal with our requirement to identify with our assigned call signs.

Here are those questions, with the correct answers:

**B-001-013-002**

**Q:** How often must an Amateur Radio station be identified?

**A:** At least every 30 minutes and at the beginning and at the end of a contact.

**B-001-013-003**

**Q:** What do you transmit to identify your Amateur Radio station?

**A:** Your call sign.

**B-001-013-004**

**Q:** What identification, if any, is required when two Amateur Radio stations begin communications?

**A:** Each station must transmit its own call sign.

**B-001-013-005**

**Q:** What identification, if any, is required when two Amateur Radio stations end communications?

**A:** Each station must transmit its own call sign.

**B-001-013-006**

**Q:** What is the longest period of time an Amateur Radio station can transmit, without identifying by call sign?

**A:** 30 minutes

**B-001-013-009**

**Q:** The call sign of an Amateur Radio station must be transmitted:

**A:** At the beginning and at the end of each contact and at intervals not greater than 30 minutes.

**B-001-013-011**

**Q:** The call sign of a Canadian Amateur Radio station would normally start with the letters:

**A:** VA, VE, VO or VY.

The regulations, the policy and the questions use words like “must” and “shall”. There isn’t any wiggle room. We have to identify our stations with our ISED-issued, assigned call signs. Tactical call signs may be used, but they are just part of the content of the communications between stations in a public service event.

*So, you can and should use tactical call signs in public service events.*

That does not exempt you from the regulatory and policy requirement to identify with your official assigned call sign. I suggest you slip in your regular assigned call sign at the beginning and end of every exchange of communications. For example, let’s pretend I am playing a role in a public service event and my tactical call sign is “Check Point 7” (CP7). I want to call in to Net Control (NC) with some information. Here is what I might do:

**CP7:** “Control, this is Check Point 7 VE3KG”

**NC:** “Check Point 7, go ahead”

**CP7:** “The Check Point captain reports that we have had 472 riders come through in the last hour and that we are low on bottled water. Can you please arrange to have more bottled water delivered to Check Point 7?”

**NC:** “Roger Check Point 7. Thank you for the count. I will advise the support team to bring water to your check point.”

**CP7:** “Roger, Control. Thank you. VE3KG”

Net Control should be doing the same thing as well, but I kept the focus on my responsibility to identify.

You don’t have to make a big deal of using your call sign. You don’t have to do it in phonetics. Just quickly slip in your call sign at the beginning and end of each exchange and move on. If someone gets heartburn over your five or six syllables, they have lost perspective on our responsibilities.

*To summarize, please use tactical call signs when it’s appropriate. But use your official call sign, too.*

**Clubs: Which Call Sign to Use?**

A good friend and RAC member called me recently to ask about what call sign he should use when operating a club station. Is he required to use the club’s call sign or is he allowed to use his own personal call sign? With many things regulatory, the answer is “it depends”.

Before 2000, Radio Amateurs had two documents giving them authority to operate: a certificate which documented the qualifications you had earned; and a station licence with a call sign. In 2000, Amateur station licences were abolished and our call signs were combined with our certificates in one single document.

Our certificates authorize us to operate from any location in Canada. When we had station licences (pre-2000), there was a specified “station location” on the licence, but we were still authorized to operate from any location in Canada. Now we must have an address registered with ISED, but that is a contact address, not a station location.

What is the real purpose of a call sign? A call sign identifies a qualified person who is responsible for the transmissions made with that call sign. In the unlikely event that ISED has to begin an investigation because of some operational or technical misbehaviour, they may start with the person who is on record as the holder of the call sign used to identify those transmissions.

Many Amateur Radio clubs choose to hold one or more call signs. They may use these call signs to identify the operations of the club’s station or the

club's repeaters. Some club call signs only hit the airwaves during Field Day, others are dormant. My local club of 41 members holds 10 (!) club call signs. Five are used to identify repeaters. One is used only on Field Day each year. The other four are not used at all at present. We don't actually have a club station, but if we did, we might use one of those call signs for operations from that location.

To have a club call sign, an Advanced Amateur must be willing to be the trustee. The trustee must accept responsibility for transmissions made using the club call sign. The trustee will be the first point of contact if ISED comes calling on an enforcement matter.

ISED has set no other standards for what constitutes a club. There are many clubs that are legally incorporated and have constitutions, committees and club stations. There are many others that are just a "bunch of guys", and still others that are one-person "phoney" clubs with a funny name, a club call sign and nothing else.

### Clubs Can Make Policy

Clubs are free to make up their own internal rules for how they use their call signs.

The club can freely decide that a condition of operating from the club station is that only the club call sign must be used.

Equally, a club could decide that members are free to use their personal call signs or the club's call sign when operating from the club station. Either way is completely legitimate and in no way restricted by the regulations or ISED policy.

Within Radio Amateurs of Canada, we have our own rules for the many club call signs we have. RAC has decided that VE3RHQ will be used only from the RAC office in Ottawa and from no other location.

We have also decided that:

- Some of RAC's other call signs (VE1RAC, VA2RAC, VA3RAC, etc.) can be used by RAC members anywhere in the region indicated by the prefix (ex: VO2RAC may only be used by RAC members from locations in Labrador).
- Some of these call signs will count as special stations in RAC's own contests.

These are decisions RAC made and your club can make similar rules about how your club's call signs are used.

So under the *Radiocommunication Regulations* and ISED policy, my friend is free to use his personal call sign from the club station. If the club has its own rules about how the club station and the club call sign are to be used, that's down to the club, and my friend will just have to comply with the club's rules.

### Accredited Examiners and RIC-1

Over 99% of Amateur Radio examinations in Canada are administered by 300 volunteer "Accredited Examiners" (AEs). ISED issues a "Letter of Authority" (LOA) to each AE when first accredited, and when their accreditations are renewed every three years.

An AE I know just received his renewal LOA, and was surprised to see a line stating his authority is "valid only for examinations conducted in" his province. ISED's LOA was wrong.

While AEs were previously restricted to conducting exams in their own province or territory, in May 2025 ISED modified RIC-1.

Section 5.1 now indicates that:

*"There are no provincial or territorial restrictions for conducting virtual or in-person examinations. The examiner and candidate must be located in Canada at the time of the examination."*

On November 25, 2025, ISED's Amateur Radio Service Centre confirmed to me in writing that "RIC-1 takes precedence over any (LOAs)".

So, AEs, this confirms that you may examine candidates from anywhere in Canada, and that you may conduct exams anywhere in Canada. Your old-style LOA has it wrong. On behalf of RAC, I have suggested to ISED that they update the standard LOA they send to all AEs.

### Over The Horizon Radar

There is ongoing anxiety from some Canadian Amateurs about the Department of National Defence's (DND) planned Over-the-Horizon Radar (OTHR) system.

This HF radar system will be installed in central Ontario over the next few years. The system will be audible across Canada and beyond.

The concern is that this radar system could be heard in the Amateur bands too. These concerns are based on historical and current experience with OTHR systems in the former USSR, China and Iran causing significant interference to Amateur Radio.

On behalf of RAC, I have been in contact with DND and ISED to express the concerns of Canadian Radio Amateurs about the interference potential of these systems.

I have asked for specific information on the frequencies of operation and the emission bandwidths. The information I have from DND indicates ISED has given them authority to use a large part of the HF spectrum for this OTHR system, but with a major limitation: DND **may not** use those frequencies allocated to Amateur Radio, Broadcasting and one other identified radio service.

I have provided DND with a detailed listing of all of the HF Amateur Radio allocations, and I have given them a tutorial on emission bandwidth.

While I am greatly reassured that DND intends to operate their system in a way that will not cause interference to Amateur Radio, I am seeking additional assurances that the sidebands of the system's emissions will not inadvertently bleed into any Primary allocation for Amateur Radio.

– 73, Dave Goodwin, VE3KG

