

reference to the operation of radiotelephone transmitting stations by uncertificated persons, which has been placed before the Council.

The Council notes with satisfaction the change in the Department's attitude towards this question. It will be recalled that the position taken in the Department's letter of the 10th of July was that until "this new telephone art is stabilized, and procedure and technique have become more or less standard," it was not proposed to insist upon the requirements of the regulations made under the Radiotelegraph Act. As has been pointed out, the necessity for such a period of waiting has not been felt in any other country, and the Council is glad to note that the "new art," which was sufficiently mature to be legislated about and regulated some years ago, is now recognized by the Department as having advanced during the last few weeks to the extent of being no longer mysterious. But the Council fails to agree with the Department's present contention that, regardless of "stability" and "standardization," radio certificates are really not necessary.

Taking the various classes of radiotelephone service as defined in your letter:

Class 1. Ship and shore communication on the regular ship-and-shore wavelengths. The International Radiotelegraph Convention of 1912 allots 300 metres as a ship wavelength. If, for operation on such wavelengths, "the Department calls for the services of a regular First Class operator," the Council would like to know why this requirement is not demanded of the following vessels on the Pacific Coast of Canada:

Name of Ship	Call	Wave-length	Boat class	Eligible grade of Operator
B. C. Forester	VGJR	300	3rd	2nd Class
Cottonwood	VGLP	300	3rd	2nd Class
Eunice B.	VGFS	300	3rd	2nd Class
Kiora	VGCK	300	3rd	2nd Class
Elmera	VGLD	300	3rd	2nd Class

With these vessels may be classed the steamers "Coutli" and "Prospective," which use wavelengths of 375 and 350 metres respectively, and are therefore sufficiently close to 300 metres to cause interference. Not one of these ships—the only ships equipped with radiotelephones on the Pacific Coast of Canada—carries a telegrapher. The Council submits that if these boats are big enough to carry transmitters which are capable of causing interference, they are big enough to carry the operators demanded by the regulations and by Article 10 of the International Convention; further, that in winking at these infractions the Department is not only permitting a breach of the law but also causing a real hardship to the holders of its certificates.

Class 2. Broadcasting stations. While the Department may not, as you state, appreciate the necessity for having a telegrapher in charge of broadcast stations, the regulations made by the Department, pursuant to the Radiotelegraph Act of 1913, and in conformity with the practice of the rest of the

world, call for a First Class operator at such stations. The Council would be glad to know the reason, if any, for the non-enforcement of this regulation, and for any information as to what conditions in Canada are so markedly different from those prevailing elsewhere as to warrant such a difference in administrative practice. While it is not suspected that the Department is greatly concerned for the welfare of those holders of First Class certificates who are by right entitled to a share of the positions on shore, this aspect of the matter is of great moment to the Council. The numerous married ship telegraphers who have been at sea for a number of years find that, by the laxity in the enforcement of the regulations for broadcast stations, the more congenial shore position which they have been looking forward to has been placed beyond their reach. For this reason, and for the protection of the organized press telegraphers against a newspaper-owned and non-telegrapher-operated radio communication service, the Council requests that the Department change its policy with a view to insistence on proper telegrapher control of broadcast transmitters.

Class 3. This class should be split in two. In the case of land radiotelephone stations, far removed from the seaboard, the consideration of interference with other radiotelephone stations, and with radiotelegraph stations, should of course be the determining factor in regulating the Class of Operator to be carried. It is not understood how non-telegrapher personnel at such stations could be made aware of interference caused by them with radiotelegraph stations not also equipped with telephones, and in other countries telegraphers are borne on such radiotelephone stations. One would not expect to find radiotelephone point-to-point stations on the sea coast operated by other than competent telegraphers, in view of the likelihood of interference with ship stations, yet the station at Knight Inlet, B.C., has no certificated operator and its wavelength of 540 metres is very close to the regular ship wave.

In the case of ship-and-shore communication, whether carried out "on waves other than the regular ones" or not, both the International Convention and the Canadian regulations made under the Radiotelegraph Act require that telegraphers shall be employed. It is apparently sought to palliate the failure to observe these rules by speaking of the use of waves "sufficiently removed from the regular waves as to avoid possibility of interference," but a slight acquaintance with radiotelephony convinces one that such an absolute avoidance of interference is impossible. It is also obvious that a ship station, equipped with radiotelegraph apparatus only, could not ask a radiotelephone station to cease interfering except by the use of telegraphy.

In conclusion, it is submitted that whatever further degree of "stabilization" or "standardization" remains to be attained—whatever air of mystery might still cling to the subject—is all the more reason for the enforcement,

without favour or prejudice, of such regulations as have already been made in conformity with the law, and the Council requests your Department to see that they are administered in a spirit of fairness to the great number of telegraphers whose livelihood they so vitally affect.

Yours very truly,
W. T. JONES,
Secretary-Treasurer,
Vancouver District Council,
Commercial Telegraphers' Union
of America.

(218-13-11) Vancouver, B.C.,
November 6th, 1925.

The Deputy Minister,
Department of Marine and Fisheries,
Ottawa, Ont.

Dear Sir:

I should be glad to have an acknowledgment of my letter of 29th September, with reference to the employment of certificated telegraphers on radiotelephone transmitting stations.

In this connection it may be noted that still another steamer, the "Alco," is now added to the list of those which are operated by non-telegrapher personnel, contrary to the law and with the apparent sanction of your department.

Before taking this matter further, we shall welcome a statement of the department's intentions respecting the enforcement of the law and the regulations.

Yours very truly,
W. T. JONES,
Secretary-Treasurer,
Vancouver District Council No. 15,
Commercial Telegraphers' Union
of America.

VOLUNTARY ASSESSMENT OF BENEFICIARIES IN C. G. R. S.

The receipt is acknowledged of the following amounts from those members who secured increases of salary under the recent revision. The spirit shown by these members in the prompt recognition of their obligation to the Union is appreciated by the General Committee.

It is hoped to publish a further list at an early date showing any further contributions of one month's net increase. Several of the amounts shown below are part payments, the balance being promised by the members concerned.

S. A. Shatford	\$20.00
A. I. Deacon	4.00
F. S. Ogilvie	15.00
H. M. Cox	10.00
V. J. Bond	2.50
B. W. Mugford	10.00
H. D. Tee	4.00
E. H. Harris	19.00
A. E. Axcell	7.50