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**GMCO Response to
Canada Gazette Notice No. SMBR-002-98**

Notice No. SMBR-002-98: DTV (Digital Television) Transition Allotment Plan

1. General

The Ontario Government, through the Government Mobile Communications Office (GMCO), welcomes the opportunity to comment on Industry Canada's Notice No SMBR-002-98 published in Canada Gazette dated June 1, 1998.

Introduction

The ability of public safety and public service agencies to communicate efficiently is vital to the safety and welfare of the citizens they represent. In times of emergencies, the public looks to government, particularly their public safety officials, to act swiftly and correctly while performing the tasks which must be done to save lives, help the injured, and restore order. Most disasters occur without warning, but people still expect a rapid and flawless response on the part of their public safety agencies. There is no room for error. One of the major components of responding to and mitigating a disaster is wireless

communications. These wireless communications systems are critical to public safety agencies' ability to protect lives and property and the welfare of the general public.

Public Safety's limited spectrum is an issue which affects interoperability and impacts every person in Canada. Whether calling for an ambulance, the fire department, or for the police, the concern is the same: public safety personnel must be able to communicate with each other to protect themselves and to serve this country's citizens. As a nation, we must find a way to provide public safety agencies with the proper resources so that they can carry out their critical functions.

Potential Additional Spectrum

The introduction of Digital Television (DTV) and the consequent phase-out of analogue TV affords an opportunity to improve efficiency of spectrum usage while simultaneously providing the public with greatly enhanced television service (ATSC A/53 standard). This improvement in spectrum efficiency will be manifested in the release, after a transition period, of TV channels for potential re-assignment. The DTV Transition Plan assumes that channels 60-69 could be subject to re-assignment.

Channels 60 to 69 are adjacent to land mobile bands operating in the spectrum range 806-890 MHz. The redeployment of spectrum in lower bands is unlikely to yield spectrum suitable for large trunked systems, thus they will have to be accommodated at 800 MHz or in new spectrum. It should be noted that no new spectrum has been made available for land mobile since 1982, other than the 6 MHz from 800 MHz reserve for public safety. This spectrum, as is the case for all other spectrum, has severe restrictions in the border areas. Further, the current spectrum does not begin to address public safety data needs beyond the year 2000, or indeed even for the present.

Unless immediate measures are taken to alleviate spectrum shortfalls and promote interoperability, Public Safety and Public Service agencies will not be able to adequately discharge their obligation to protect life and property in a safe, efficient, and cost effective manner.

The Congressionally mandated reallocation in the United States of channels 60-69, the 746-806 MHz band, provides a clear incentive to make similar provision in Canada. For public safety, the reallocation of 24 MHz, coupled with a mandated early availability, will ensure that suitable equipment will be available in this spectrum, as well as providing the capability of interoperability in border areas. Thus, spectrum efficient digital technology may be expected to be available

DTV Transition Allotment Plan

A long-term goal is to obtain additional spectrum for the various mobile services. A potential candidate has been UHF TV spectrum, and recent U.S. action to make spectrum between 746 and 806 MHz (presently TV channels 60-69) available to land mobile is a welcome move, as is the designation of 24 MHz of this spectrum on an accelerated basis

for public safety. The availability of common spectrum, especially for vital public safety operations, would be a worthwhile outcome of any spectrum re-allocation.

One encouraging note of the transition from analogue to digital TV is that once the NTSC channels are switched off, there is a good probability that the TV channels above channel 59 (and possibly 54) would be available for re-allocation. The plan further removes vacant allotments on channel 60 and above and pairs DTV channels only with operating stations.

It appears that the Canadian transition allotment plan was not successful in avoiding new allotments above channel 59 for two reasons:

- the U.S. plan was created first, producing severe constraints in border areas;
- the Canadian plan accommodated low power stations.

However, should a decision be made to reallocate the spectrum between 746 and 806 MHz, after the phase-out date for analogue TV any stations operating above channel 59 would have to move.

Recommendations

Based on the discussion given above, the following recommendations are made.

1. Industry Canada undertake a policy consultation on the long-term future of spectrum between [746] and 806 MHz, from the perspective of reallocating this spectrum for mobile services to meet needs beyond the year 2000, in particular for public safety and public service.
2. Special consideration be given to expediting access for public safety to the bands 764-776 MHz and 794-806 MHz (TV channels 63, 64, 68, 69).
3. The needs of public safety be taken into account in establishing the date for transition to DTV and the transfer of DTV stations operating above channel 59 to channels below 59.

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