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Sent via email: aws@ic.gc.ca

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Subject: Canada Gazette, Part 1, December 8, 2007, Consultation on Proposed Conditions of Licence to Mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements. (DGRB-010-07)

Dear Sir,

The Edmonton Police Service (EPS) appreciates the need to encourage the sharing of radio tower facilities as expressed in DGRB-010-07. The EPS is however, concerned that applying the proposed *conditions of licence* to public safety radio licencees, could negatively impact the operations of police services and the other public safety agencies. We feel that this requirement will risk the security of police communications and introduce a significant administrative burden on Public Safety agencies.

We are encouraged by Item 2 under the *Conditions of License for Mandatory Antenna Tower and Site Sharing and Prohibition of Exclusive Site Arrangements* which seems to acknowledge our concern by stating:

“Licensees must share where technically feasible except where national security concerns exist...”

We support this statement but believe that this exception referring to national security is not specific enough to include public safety organizations such as the EPS. We therefore recommend that this phrase be modified to read as follows:

“Licensees must share where technically feasible except where national security **or public safety** concerns exist...”

We feel it is important that public safety agencies have the choice regarding the sharing of their antenna towers and sites. To minimize the administrative burden of dealing with requests to share radio infrastructure it is important that public safety agencies be included in the exemption and thereby not be subject to the process outlined through the proposed condition of licence.

Thank you for the opportunity to present our concerns.

Sincerely yours,

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