



CANADIAN ASSOCIATION
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January 18, 2008

Director,
Spectrum Management Operations,
Radiocommunications and Broadcasting Regulatory Branch,
Industry Canada,
300 Slater Street,
Ottawa, Ontario,
K1A 0C8.

RE: Gazette Notice No. DGRB-010-07 — Consultation on Proposed Conditions of Licence to Mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements

Greetings,

Let me preface our comments by stating that we recognize the date of January 11th, 2008 has passed, but our position parallels that of the CITIG. More specifically, apart from potentially placing an additional burden on the taxpayers at the Municipal, Provincial, and Federal level, your proposal gives us pause for the following reasons:

The potential increase in demands for mandatory sharing of sites owned and operated by the aforementioned governments will force an increased workload of a highly technical nature, and in some cases, require that government hire additional staff, in order to deal with these demands.

It is also not clear, as to who will bear the burden of proof where a refusal for technical reasons is invoked. Nor is it clear as to how "reasonable" charges will be calculated, and who will bear the cost of arbitration when such contestation is invoked.

The term "National Security" is used in the said document, but as much as it is easily applied to Police Services, it is not so easily used by Fire Departments, and even less so by other governmental services who often share our sites and offer emergency services to the people of Canada.

This short list reflects only our deepest concerns, and should not be considered as exhaustive. It is for all these reasons and more, that we wish to be consulted on these matters before they are finalized.

Thank you in advance for your cooperation in this matter,

Fire Marshal Patrick Burke
President
Canadian Association of Fire Chiefs