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**G**azette Notice *DGRB-010-07* recently circulated by Industry Canada (IC) is soliciting comments relating to “Consultation on proposed Conditions of Licence to mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements”. The bulk of these proposed changes to the Client Procedures Circular 2-0-03 (CPC-2-0-03) have been phased in over a six month period beginning June 24, 2007 and becoming effective January 1, 2008.

### MANDATE ANTENNA TOWER & SITE SHARING

Peel Regional Police operates an 800MHz, 8 site simulcast radio system (VCOM) through out the Region of Peel. All 8 sites are non-exclusive and are shared with other public safety agencies including the RCMP as well as private sector entities such as Bell Mobility & Rogers. These sharing agreements are negotiated in good faith based on established framework and terms by VCOM management and the Region of Peel property management group. Although highly unlikely, IC could authorize activities that would compromise public safety. The absence of a “best practices policy” that clearly defines activities & steps involved with arranging site agreements, could compromise the ability to negotiate timely agreements in good faith. In addition, this lack of clear policy would prove burdensome to management officers (or arbitrator interpretation) resulting in inconsistent decisions.

### MANDATORY ROAMING AGREEMENTS

*Are we to assume the hierarchy of Public Safety (PS) is to continue (SRSP-502 S5.1.1)? Are band constraints exclusivity to be reviewed? When?*

Despite IC recognition of this hierarchy, technical situations may eventually exist that force system operators (agencies) to share spectrum resources as an alternative to physical site occupation. Access to sites other than our own may be beneficial if VCOM2 migrates to 700MHz and / or regional broadband initiatives are developed, however the successful integration of private agencies onto our system is questionable. Again, lack of clear internal & external policies with PS agencies could compromise the ability to negotiate timely agreements in good faith. Understanding mandatory roaming should reduce the infrastructure necessary to ensure competition, it could, however limit users’ hardware options. Although primarily aimed at the Personal Communications Services (PCS), & Advanced Wireless Services (AWS) providers, the same philosophy could be used to maneuver municipal and provincial PS agencies to build out a provincial or nation wide area radio network.

### IN SUMMARY, CONSIDERATION SHOULD BE GIVEN TO:

- create a clear definition, framework or set of best practices that stipulate the unique needs and prioritization of Public Safety technology and security,
- create a licence condition that allows “future considerations” to virtually occupy site space, both physical and electrically (RF). i.e.: reserved for future expansion for PS agencies & growth,
- ensure the hierarchy of Public Safety (PS) is to continue & adopted as a best practice,
- ensure the arbitrator selection process includes qualifications of a public safety background and knowledgebase to ensure PS agency issues are understood and considered, and,
- request PS agency comments prior to amending Spectrum Management and Telecommunications Policy.

### RESPECTFULLY SUBMITTED

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