



Royal Canadian Mounted Police
Gendarmerie royale du Canada

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Security Classification/Designation
Classification/désignation sécuritaire

Unclassified

Your File Votre référence

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

Our File Notre référence
GV 195-149-2

2008-01-17

Dear Sir/Madam,

**ROYAL CANADIAN MOUNTED POLICE COMMENTS ON CANADA GAZETTE NOTICE, PART I
DGRB-010-07 ON MANDATING SITE/TOWER SHARING (November 28, 2007)**

The RCMP is pleased to respond to GN DGRB-010-07 - Consultation on Proposed Conditions of Licence to Mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements dated November 28, 2007.

The RCMP will comment only on the site/tower sharing aspect of this consultation.

We commend Industry Canada's initiative to provide clear directives on this important issue for all parties involved, proponents of radio stations and the public. We firmly believe that benefits will outweigh issues that may be raised.

As a federal agency, the RCMP is committed at sharing infrastructures with other partners to achieve greater sustainability of assets and to improve the interoperability with public safety partners. The RCMP has an inventory of close to 650 tower structures that are owned and some have sharing/lease arrangements with many private, commercial or public safety organizations. Two thirds of these 650 structures are smaller 15 meter structures located at our detachment offices. In addition to the owned structures, the RCMP has lease or sharing arrangements of some sort (building rooftops and tower structures) for another approximate 1000 locations throughout Canada. The RCMP is also a significant partner on leased and shared radio systems facilities which are not accounted for above.

Overall, it has been a very positive experience for the RCMP and we have not experienced any of negative impacts. The RCMP intends to continue sharing site and tower structure facilities wherever and whenever it is possible.

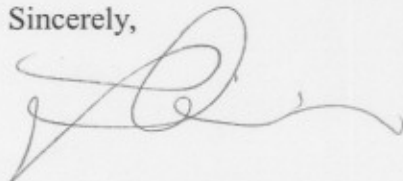
The RCMP supports the government initiative to encourage tower and site sharing as much as possible and where there are no major technical or security issues. However, the RCMP would have preferred that the process remains as proposed in June 2007, a non-mandated process, especially for the public safety agencies which have special requirements.

These special requirements for mission-critical and secure communications are sometimes incompatible with opening up public safety facilities to other parties. An example might be business continuity planning to counter disasters or catastrophes. This scenario may be a valid reason not to have all users, commercial and public safety, in an area on the same tower. There are many other aspects aside from technical feasibility and national security to take into account by public safety which are non-profit organizations. For example, there may be financial implications of larger initial capital investments than planned, difficulties in recovering costs and public safety agencies not being set-up to collect revenues.

The determination of tower siting and sharing implications could become such a complex matter in some instances that the RCMP would prefer that it be left to the parties to address through private negotiations.

These aspects may warrant further dialogue between the public safety community and the Department to alleviate some of the concerns for the future.

Sincerely,



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