



York Regional Police

Chief of Police
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January 22, 2008

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

Dear Sir,

RE: Gazette Notice DGRB-010-07 – Consultation on Proposed Conditions of Licence to Mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements

York Regional Police owns and operates both voice and data radio systems for the provision of essential policing and fire services within the Regional Municipality of York. It is with some concern that we comment upon Gazette Notice DGRB-010-07 in respect to the proposed provisions effecting antenna tower and site sharing and the prohibition of exclusive site arrangements.

It is recognized that there are strong arguments to be made for encouraging sharing of radio communication infrastructure and that many public safety organizations, including York Regional Police, do so to some degree. It must also be recognized that most public safety agencies construct and use radio communications systems only as an essential adjunct required to ensure the delivery of essential services on a daily basis and to maintain public safety, even in the most difficult of circumstances. Clearly, for these purposes, ensuring reliability and security of communications systems is given high priority within public safety organizations.

With these circumstances in mind it is essential that public safety agencies maintain some rights with respect to ensuring security of sites owned and operated by them. For example, it is not unreasonable that employees of commercial interests seeking access to such locations be required to submit to security screening. Leaving such decisions to be made by individual arbitrators scattered across Canada is unlikely to result in consistency or an expectation that the reasonable security concerns of agencies will always be respected. Inclusion of such provisions within the regulations with respect

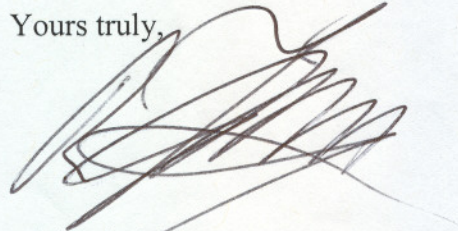
"Deeds Speak"

to public safety sites would bring greater certainty and ensure better security of critical infrastructure.

It is also possible that agencies may face considerable unplanned expense as a result of the need for site management, engineering and legal services not envisioned prior to the introduction of these proposals. Unlike large telecommunications carriers, public service agencies cannot recoup these expenses by way of profit. The public will undoubtedly bear such costs by way of tax levy and therefore the regulations should include provisions which shift these costs towards "for profit" applicants and away from public safety agencies.

We would welcome an opportunity to further discuss solutions to the practical issues which will arise as a result of the proposed changes with a view to achieving the objectives of Industry Canada, while at the same time ensuring that the safety and fiscal interests of the public are protected.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Richard Finn', written over a horizontal line.

Richard Finn
Superintendent
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