



June 28, 2007

Director, Spectrum and Radio Policy
Telecommunications Policy Branch
Industry Canada
1604A, 300 Slater Street
Ottawa, ON K1A 0C8

Dear Sir or Madam

Re: Canada Gazette, Part I, March 2007, Proposed Spectrum Utilization Policy, Technical and Licensing Requirements to Introduce Dedicated Short-Range Communications-based Intelligent Transportation Systems Applications in the Band 5850-5925 MHz (DGTP-003-07)

ITS Canada is supportive of the Department's initiatives to define policy for the use of Dedicated Short-Range Communications (DSRC) in the 5850-5925 MHz band. This consultation on the introduction of new DSRC-based ITS applications is important and timely since the comparable DSRC Proof of Concept system is scheduled for trials in the United States this year. Given the high volume of vehicular traffic to and from the United States, Canadian policy is well served if the Department addresses DSRC capabilities for the domestic market, with a view to being interoperable with equivalent radio spectrum uses in the United States.

ITS Canada would like to make the following general comments:

- a) Interoperability with U.S. standards and deployments is essential. North American drivers and passengers should be able to enjoy the benefits afforded by any deployed safety systems, regardless of the jurisdiction in which their vehicles are registered or manufactured. So, if there is a signalized intersection providing collision avoidance features, for example, a vehicle from either country ought to be able to take advantage of that life-saving service. Cross-border electronic road tolling would be achievable via interoperable devices.
- b) Standards development requires support from the public sector. In our view, it would speed up efforts if public sector representatives drive the establishment of safety message prioritization. Also, as deployment for safety systems begins, there will be a need to complete designs and implementation of security features. It would be prudent to have public sector coordination, to ensure widespread availability of security solutions and to ensure safe keeping and proper management. The time to act on these issues is now.

- (c) Interoperability of public safety applications implemented on DSRC networks is a reality with this approach. The ASTM and IEEE standards need to be enhanced for devices from different entities to interact with one another and to exchange information according to a prescribed method in order to achieve predictable results.
- (d) ITS Canada agrees with the DSRC definition as proposed in Section 3.1. We would like to stress the wide range of safety applications of DSRC, including adaptive cruise control, intersection collision avoidance, lane departure alerts, incident detection and notification, approaching emergency vehicle warning, braking information sent to surrounding vehicles, lane changing assistant, road works warning, adaptive lighting, etc. We would also support emphasis on comfort and convenience applications, e.g., electronic payment services and traveller information services.
- (e) We agree with the channelling plan as proposed, and view interoperability with the U.S. as very important.
- (f) We agree with the proposal for open eligibility.
- (g) ITS Canada supports the four-tier geographical service area scheme. However, it should be possible to grant licenses within a service area on a non-exclusive basis.
- (h) We agree that the American Society for Testing and Materials (ASTM)-DSRC standards should be used. Again, it is important that Canadian equipment be interoperable with U.S. equipment, so it makes sense to adopt the same standard. ASTM has already been adopted in Canada for other applications.

In addition, ITS applications operated by government entities in Canada can benefit from lower procurement and operating costs when standardized equipment can be sourced from and supported by a variety of competing suppliers.

ITS Canada would like to thank you for this opportunity to provide comments on Industry Canada's proposed spectrum utilization policy for DSRC-range communications-based ITS applications. We look forward to continuing to participate in this initiative as needed.

Sincerely

ITS CANADA



Colin A. Rayman, P.Eng
General Manager