



June 27, 2007

Director General
Telecommunications Policy Branch
Industry Canada
1612A, 300 Slater Street
Ottawa, Ontario K1A 0C8

Dear Sir / Madam:

Comments on Proposed Spectrum Utilization Policy, Technical and Licensing Requirements to Introduce Dedicated Short Range Communications Based ITS Systems Applications in the Band 5.85 – 5.925 GHz

IBI Group, a member of ITS Canada, would like to take this opportunity to provide positive comments on the proposed spectrum allocation for DSRC for ITS applications in the 5.85 – 5.925 GHz.

IBI Group is a major ITS system integrator, software and systems provider and Consultant of DSRC based ITS systems in Canada, U.S., U.K. and other International locations. IBI Group has had extensive experience on DSRC applications and research and development (on DSRC) going back to the early days of type 1 passive technology to modern multi-protocol OBU (On Board Units) and transponder/reader systems.

Reviewing the proposed spectrum utilization policy pertaining to 5.85 - 5.925 GHz frequency range and associated technical and licensing requirements we would like to offer a few comments for your review.

OVERALL

- Designating 75 MHz of spectrum for ITS Systems in the 5.85 – 5.925 GHz to fully harmonized the ITS applications with United States is a win-win situation for all users, systems suppliers and agencies.

DSRC DEFINITION – APPLICATIONS

- The definition could include financial/payment information transfer as another set of messages that would be communicated.
- The 8 groups that are identified as DSRC based ITS applications include:
 - Travel and Traffic Management, Maintenance and Construction Operations, Public Transit Management, Electronic Payment, Commercial Vehicle Operations, Information Management, Grants Vehicle Safety Systems;

And associated applications:

- Electronic Toll Collection, Transit Vehicles in a priority, Gas (Fuel) Payment, Parking Payment, Electronic Commerce, Traffic Information, Management of Public Transportation and Commercial Vehicles, Street Management, Work Zone Warning, Road Condition Warning, Billing Information, and Border Crossing Clearance.

Cover the major application. In addition, providing the capability for private commercial payment systems (fast food, Drive in location, access to Provincial Parks) may be identified.

BAND PLAN

IBI Group concurs with the proposed band plan including Channel 172 and Channel 184 that would be compatible with U.S. designation of communicable vehicle safety communications as well as public safety applications. This would strengthen the interoperability requirements.

ELIGIBILITY

IBI Group fully endorses opening the spectrum to a wide range of potential licenses as possible without restrictions with a carrier that they meet the eligibility criteria for radio communication carriers as set out in appropriate regulations.

RADIO AUTHORIZATION

The proposed spectrum licensing for DSRC based ITS applications which would authorize all those to operate the frequency assigned within defined geographic service area is practical and provides increases in the licensee's flexibility to manage spectrum resources. It also reduces administrative burden and operating costs. Does duration of licence effectiveness need to be identified?

SERVICE AREAS

Proposed four tier service area structure applicable for spectrum licensing through comparative licensing processes provides a robust and standardized scheme which supports the management of geographical licensing needs.

TECHNICAL RULES/ASTM STANDARD

It is desirable for Canada to require all DSRC operations in the 5.925 GHz to comply with the ASTM-DSRC standard. This would ensure adequate markets are developed to facilitate deployment of ITS applications for use in the Canadian Transportation environment.

POWER LIMITS

The proposed power limits for the ASTM-DSRC standard described in the proposal, is practical, embodies interoperability and provides reliable platform for DSRC based ITS applications to be deployed in the Canadian market.

We trust this information is pertinent to your call for comments.

Yours truly,

IBI GROUP



Tissa De Silva
Director