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June 29, 2007

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

Re: DGTP-003-7

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

Introduction

Novax Industries Corporation welcomes the opportunity to participate in the public Consultation on the proposed spectrum utilization policy for Dedicated Short-range Communications-based Intelligent Transportation Systems Applications in the Band 5850-5925 MHz.

Novax Industries Corporation is a Vancouver based leader in the development of wireless Intelligent Transportation Solutions (ITS) Technology with a product portfolio that addresses global opportunities in the 2.4 GHz, 4.9 GHz and 5 GHz frequency bands. Novax is a member of ITS Canada and WinBC. Novax technology is focused on the IEEE 802.11 and 802.16 standards.

Specific Responses

Comments are sought on the proposed definition and applications.

Novax Industries Corporation supports the definition of Dedicated Short Range Communications Systems in the 5.9 GHz band for roadside and mobile units. Novax has developed a set of wireless ITS applications today to support traffic systems and other ITS solutions and believes that a dedicated 5.9 GHz will further allow the evolution and development of such technologies and solutions.

Novax also supports the use of 5.9 GHz for DSRC application for the following applications:

Travel and traffic management, maintenance construction operations, public transit management, electronic payment, commercial vehicle operations, emergency management, advanced vehicle safety systems, and information management.

Comments are sought on the proposed transition policy outlined in Appendix A.

Novax Industries Corporation supports the proposed transition policy outlined in Appendix A.

Comments are sought on the proposed channelling plan and whether to adopt U.S. designations for channels 172 and 184.

Novax Industries Corporation supports the proposed channelling plan to adopt U.S. designations for channels 172 and 184.

In addition, Novax sees the predominant use of 802.11-based protocols for channels 175 and 181 to deliver the applications defined earlier within DGTP-003-7.

The Department seeks comment on the proposal for open eligibility.

Novax Industries Corporation supports the requirements of CPC-2-0-15 for eligibility.

The Department seeks comments on this or any other potential method for licensing DSRC-based ITS applications in the band 5850-5925 MHz.

Novax Industries Corporation supports spectrum licensing by defined geographic area. Our experience with 2.4 GHz 802.11 technologies has proven that operational movement of equipment is a requirement and station based licenses would prove to be an additional and unnecessary burden given the low power and range of the 5.9 GHz definition for DSRC.

Comments are invited and should articulate the most appropriate process to determine geographical service areas for DSRC licensees.

Novax Industries Corporation believes that the development and deployment of 5.9 GHz technologies and applications will occur on a regional basis. In particular large metropolitan areas of the country where there are significant vehicular and transportation system requirements.

Comments are sought on the applicability of the ASTM-DSRC standard and the degree to which the equipment should be compliant.

Novax Industries Corporation believes that industry standards such as ASTM-DSRC are critical to the deployment of any transportation system. Compliancy requirements will lead to low cost volumes and better interoperability between systems allowing the growth and evolution of DSRC systems.

Comments are sought on the ASTM-DSRC standard above and its application in Canada noting that it segregates public safety applications and private use.

The Department retains discretion to revisit these limits at such time as the ASTM E17.51 DSRC Standards Writing Group may determine that revisions are necessary.

Novax Industries Corporation supports the ASTM-DSRC standard as defined.

Sincerely,

A handwritten signature in black ink, appearing to read "L. DaLuz". The signature is stylized with a large initial "L" and a long, sweeping tail.

Larry DaLuz
Director, Wireless Services
Novax Industries Corporation

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