



CANADIAN ASSOCIATION  
OF FIRE CHIEFS

232-329 March, Box 11  
Ottawa, ON K2K 2E1

L'ASSOCIATION  
CANADIENNE DES CHEFS  
DE POMPIERS

Tel : 613-270-9138  
Fax : 613-599-7027  
E-mail: info@cafc.ca

April 12, 2006

Mr. Larry Shaw  
Director General  
Telecommunications Policy Branch  
Industry Canada  
300 Slater Street  
Ottawa, Ontario  
K1A 0C8

Dear Mr. Shaw:

**Reference:** *Canada Gazette*, Part 1  
Publication date: November 29, 2005  
Title: Proposals and changes to the Spectrum in  
Certain Bands Below 1.7 GHz  
Notice reference number DGTP-004-05

## A. INTRODUCTION

The February 2004 Throne Speech stated “there is no role more fundamental for government than the protection of its citizens.” That statement of philosophy coincides perfectly with the mandate of Fire Departments across Canada: to protect the lives and property of Canadians within their municipal jurisdictions either as permanent residents or as visitors.

It is the position of the Canadian Association of Fire Chiefs (CAFC) that permitting removal of the availability of any part of the 150 MHz Band from the Fire Services will serve the best interests of neither the citizens of Canada nor of both the Fire Services and the federal Government which jointly share the responsibility to protect those citizens.

### **About the Canadian Fire Services**

Canadian Fire Services demographics are:

<b>Type of Department</b>	<b>Number of Departments</b>	<b>Number of Personnel</b>
• Full-Time	95	23,694
• Composite	213	N/A
• Volunteer	3,184	84,314
• Total	3,492	108,008

Composite Fire Departments are staffed by a combination of full-time and volunteer personnel.

Ninety-one per cent of all Fire Departments in Canada are Volunteer Fire Departments.

### **About the Canadian Association of Fire Chiefs**

CAFC is a non-partisan national association formed in 1909 and comprised of some 1,000 Chief Fire Officers located in every Canadian Province and Territory. It is the only association that speaks for all elements of the Fire Services in Canada.

The 2001 Census reported a total Canadian population of just over 30 million. The lives and property of over two-thirds of these individuals are protected by CAFC members. That Census also reported 19.6 million people residing in the 25 largest census metropolitan areas across Canada. All but one of these areas is represented in the CAFC membership. Therefore, CAFC members are the emergency first responders for 99.2 per cent of Canadians residing in the 25 largest census metropolitan areas.

## **B. MULTI-USE RADIO IN THE 150 MHz BAND**

The bandwidth from 151.820 MHz to 154.600 MHz is used in Canada almost exclusively by the Fire Services. The vast majority of the almost 3,500 Fire Departments situated in every part of Canada are using this bandwidth. There are several reasons why this is the case. They include:

- The 150 MHz bandwidth is capable of penetrating through building walls and through glass. As such, it is ideal for communicating with firefighters when they have entered burning structures to save lives.
- The 150 MHz bandwidth has been set aside for emergency communications within defined and quite small geographical areas.

- It was Industry Canada that reduced the spread available to the Fire Services from 24 kHz to 12 kHz within the 150 MHz bandwidth and encouraged the Fire Services to migrate to that location.
- The communications equipment generally available in Canada to the Fire Services is most commonly calibrated in the 150 MHz bandwidth making that a powerful inducement to the acquisition of such equipment.

To propose that the five 150 MHz bandwidths be opened up to multi-use radio service (MURS) will create significant hardship to the Fire Services. It is disappointing to read that a rationalization for the Proposal is that “Canadians are large consumers of electronic devices and radio technologies and want similar radio products as those available in the U.S. market.” It is astonishing to CAFC that consumer interests of this nature would take precedence over the needs of emergency first responders. This reaction becomes particularly acute when it is remembered that it was Industry Canada that led the Fire Services to embrace the reduced 150 MHz band width just five years ago.

### **C. PROPOSED TRANSITION PLAN**

Industry Canada has proposed a transition plan that it deems “reasonable” when it comes to permitting the sale and distribution of MURS devices in what is now regarded as the Fire Services bandwidth. CAFC does not agree with the reasonableness of this approach for the following reasons:

- During the past three years, virtually all fire trucks in Canada have had their radios replaced to prepare for the 12 kHz spread within the 150 MHz bandwidth. The costs of these replacements were borne by municipal governments and, by extension, the people of Canada.
- The five-year proposed transition period is unreasonably harsh. When Fire Chiefs stood before their municipal councils over the past three years to argue in favour of re-equipping their radios, they assured these councils that the new radios would be used for many years to come. Now Industry Canada wishes to render them obsolete within five years of the intended spectrum policy being finalized. This is despite the fact that several years from now these radios would still have a useful life of many years.
- The statement that Industry Canada “will seek to accommodate affected licensees that wish to move in other frequency bands” is sufficiently vague as to cause alarm within the Fire Services. There is no assurance that affected licensees would be accommodated, simply an undertaking to seek to accommodate them. There is no statement as to which bandwidth would be used for the wholesale transference of the communications needs of thousands of Canadian Fire Departments.

#### **D. WHAT ARE CANADIAN FIRE DEPARTMENTS SAYING?**

Initial reactions from Fire Departments across Canada indicate the depth of their concern. They include:

- "...this move will cripple the fire service in the north. It is abundantly clear that the small and rural departments cannot afford the 800 MHz adventure."
- "Industry Canada has bandwidth because it is being generated through narrow banding at the expense and inconvenience of existing users, especially public safety."
- "Most of the Ontario Fire Service runs in the 153 to 155 MHz band and they don't have the money for a change."
- "This change can have significant impact on many fire departments. The use of the 150 MHz band is widespread for paging of volunteers as well as operational frequencies for fire departments."

These comments make it clear that the financial resources of Fire Departments are limited and likely do not extend to the rapid conversion of communications equipment that is not technologically obsolete. Thus, the likely consequences of Industry Canada opening up the 150 MHz bandwidth to MURS devices would include:

- Fire Departments run the risk of having their communications channels jammed by non-public safety users. This jamming would normally be unintentional but could easily be intentional as well. People capable of arson are likely equally capable of jamming the communications of emergency first responders.
- Fire Departments, and especially smaller Departments, in adjacent communities usually have mutual assistance plans that have been well established. The purpose of such plans is to permit two or more Departments to join forces to combat a fire or other emergency that is beyond the capacity of any one Department to control. With some Fire Departments migrating from the 150 MHz bandwidth (or remaining and running the risk of jamming) these mutual assistance plans could easily be jeopardized.
- Time is a serious enemy of the Fire Services. Fires left unattended double in size every minute. This issue is particularly acute for Volunteer Fire Departments that often have to travel considerable distances to reach fires. Typically, one or two firefighters are responsible for getting the equipment to a fire. The balance of the firefighting team travels in private vehicles to the site of the fire once they are paged. To jeopardize the paging system could easily result in insufficient numbers of firefighters present at incidents.

## **E. CONCLUSION**

The Canadian Association of Fire Chiefs recommends strongly that Industry Canada abandon its moves to attempt to force Canadian Fire Departments to abandon their 150 MHz bandwidths. This submission has described the negative impacts that this attempt will have. The only benefit that the proposal to change the spectrum in certain bands below 1.7 GHz is to provide Canadian consumers with radio products similar to those available in the U.S. market. CAFC does not regard this as an important benefit. Finally, the transition measures that have been proposed by Industry Canada are not adequate.

A delegation of CAFC members is scheduled to meet with a group of your colleagues from Spectrum and Radio Policy as well as from Spectrum Planning and Engineering on Wednesday April 26. They look forward to discussing their concerns with respect to this matter at that time.

Thank you for your attention to our concerns.

Yours sincerely,

Fire Chief Donald F. Warden  
Chair, CAFC Government Relations Committee