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Director General  
Telecommunications Policy Branch,  
Industry Canada,  
300 Slate Street,  
Ottawa, Ontario  
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Dear Sir:

**RE: Canada Gazette Notice DGTP-004-05**  
**Proposals and Changes to the Spectrum in Certain Bands Below 1.7 GHz**  
**Dated: November 29, 2005.**

I am writing from the City of Toronto's Office of Emergency Management to comment on the proposals and changes to the spectrum in certain bands below 1.7 GHz. We support the overall goals of the proposal to enhance public safety communications, and offer the following recommendations for your consideration:

- The three bands most commonly used by police, fire and emergency medical services for interoperability communications should continue to be exclusively allocated to them i.e. 150 MHz VHF, 450 MHz UHF and 800 MHz.
- Inter-agency inter-operability is a major advantage during the response and recovery phases of a major emergency. This also applies to command and control of responder agencies other than the traditional first responders (police, fire and emergency medical services).

Interoperability frequencies within the 220 – 222 MHz range should be assigned to specifically licensed municipal/provincial responder agencies such as public works, transit, roads, solid waste management crews and non-government organizations such as, Amateur radio and volunteer search and rescue groups.

Supervisors of these 'on the ground' crews should be able to communicate on assigned frequencies in that range, and also maintain inter-agency communications among themselves and with their emergency operations centre or command post by moving to assigned interoperability frequencies thus ensuring their efforts are coordinated. Amateur Radio Emergency Services groups, for example, already have access to type approved equipment for this frequency range.

Thank you for this opportunity to comment on this discussion paper.

Gary Symonds, Co-ordinator  
City of Toronto  
Office of Emergency Management  
Technical Services Division