

Submission of
The Fire Fighters Association of Ontario
To Industry Canada's Proposed Changes to the Spectrum
In Certain Bands Below 1.7 GHz.
(Section 6)

The Fire Fighters Association of Ontario (FFAO) represents over 18,000 firefighters across the province of Ontario.

Our members include volunteer, part-time, paid part-time and composite fire departments. We represent very small remote fire services up to and including city fire services as well as many industrial fire departments.

The Fire Fighters Association of Ontario is committed to supporting our fire services in maintaining a safe working environment for our firefighters, and providing protection to all communities and municipalities in the province of Ontario.

Two executive officers of the FFAO and one radio specialist will be representing our association on this issue; each is an active firefighter and licensed amateur radio operator. They have an excellent working knowledge of firefighting, radio operations/radio spectrum use and how it would impact the fire service in Ontario. Our radio specialist owns and operates his own commercial radio service business outfitting fire departments with radio systems, radios, and pagers as well as providing maintenance, programming and repairs.

Relying on some expertise from our membership and from the feedback we have received, the Fire Fighters Association of Ontario has taken a position that the MURS radio system will have a serious negative impact on the fire service and the safety of firefighters across Ontario. Consider the following:

- An integral part of safety for our firefighters is communication. This could be the thread that makes the difference between a life saved and a life lost whether of a firefighter or citizen of one of our communities. Many of our rural fire services rely on paging systems to dispatch the fire department to a call. Paging in the VHF spectrum has the greatest advantage to distance and most forgiving in rough, remote or mountainous terrain. Moving the fire service to other frequencies such as 400MHZ or 800MHZ would decrease the effectiveness and distance of the signal. It would increase costs through radio re-programming and the addition of equipment to maintain the same type of coverage in a given area.
- Testing of the MURS radios has demonstrated that their use in proximity of currently used pagers and radios could impair or prevent reception of critical information transmissions.
- Many fire service personnel respond directly to the scene. A clear uninterrupted radio transmission is their only link to rapidly changing information pertaining to the nature and conditions at the emergency scene.

Once "on scene", the fire department will set up incident command. This is the heart and soul of the emergency scene. Often this communication lifeline is the only way those at greatest risk can communicate life saving information, or request further assistance.

Any changes to this portion of the radio spectrum will impact the fire service. Allowing recreational radios (MURS) to operate in the vicinity of current fire frequencies will cause conflicts and jeopardize public safety in Ontario.

In the fire service, before critical decisions are made, a careful evaluation needs to occur, including an evaluation checklist.

We need to ask:

- Is it safe?
- Is it in the best interest of the public?
- Is it right for the Ontario Fire service?
- Is it ethical, legal, professional and respectful?
- Is it consistent with the policies and values of the fire service?
- Is it something we are willing to be accountable for?

If we answer NO to any of these questions, then further consultation must take place with the stakeholders involved.

The Fire Fighters Association of Ontario respectfully request that Industry Canada take no action until a full evaluation of the potential impact to public safety can take place. Stakeholders to be involved should include, but may not be limited to: the Office of the Fire Marshall, the Ontario Professional Fire Fighters Association, the Ontario Association of Fire Chiefs, the Fire Fighters Association of Ontario and Industry Canada.

It is the opinion of the Fire Fighters Association of Ontario that emergency services such as fire require a secure Public Safety and Emergency Service portion of the radio spectrum. We feel an adequate solution can be obtained through proper consultation with the above stakeholders.

Respectfully,

John Scheeringa
efd119@rogers.com

Lee Smith
lee.smith@sympatico.ca

Executive Officers
The Fire Fighters Association of Ontario
Box 406, Cannington ON L0E 1E0