



Royal Canadian Mounted Police
Gendarmerie royale du Canada

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Security Classification/Designation
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Unclassified

Your File Votre référence

Director General, Telecommunications Policy Branch,
Industry Canada
300 Slater Street,
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Our File Notre référence
GV 195-149-2

2005-10-27

Dear Mr. Shaw,

Canada GN No. DGTP-005-05 — Proposed Spectrum Utilization Policy, Technical and Licensing Requirements for Broadband Public Safety in the Band 4 940-4 990 MHz

The Royal Canadian Mounted Police is very pleased to respond to the above consultation.

This allocation opens up new possibilities for the RCMP and will allow us to consider implementing private broadband data systems where the public offerings are not available, not affordable or do not meet our fundamental requirements for service reliability, survivability and security.

The RCMP supports completely the detailed comments provided by the Radio Advisory Board of Canada on this matter and would like to add comments in support of some points that we feel are important.

We think that it is worth re-iterating concerns about the suggestion that this spectrum could be released to other interested parties in low use areas. The RCMP believes (as stated by the RABC) that "it is premature to include provisions that would open up the 4.9 GHz spectrum and permit other uses than public safety intended use in some areas of the country. The band is in its infancy in Canada and it is generating considerable interest from the public safety agencies and the industry. Additionally, there may be emergency or disaster relief scenarios in any part of the country requiring dedicated spectrum to be available reliably and without delay. We recommend that this proposal be reviewed at a later date when public safety applications in the 4.9 GHz are mature".

The other issue we would like to comment on is the payment scheme. The current proposal, as it would be applied to the RCMP as a national organization, would act as a detriment to the RCMP's use of this spectrum. We suspect, with the proposed fees, that very few of our partner agencies will be able to take advantage of this band.

A formula that would accommodate and reflect the low number of users anticipated in the short to medium term would be more encouraging. A fee structure on a per modem instead of the spectrum rent model proposed could be an alternative. Backhaul linking and infrastructure (e.g., repeaters/hot spots) could be charged under a system approach in order to minimize the administrative burden.

As stated above, the expectations for broadband applications for public safety will continue to evolve. The 50 MHz allocated will not be a panacea and will not be sufficient for all the future mobile broadband applications, for example in an urban area.

As a large organization encompassing many areas across Canada, the RCMP must interact with public safety partners for law enforcement, national security and emergency relief purposes. We are particularly concerned on the need for an orderly development of the band and request an allowance of spectrum reserved for national security/itinerant ad-hoc style applications. In order to maximize the benefits of this new band to the public safety, we feel that it will be essential to establish sharing and coordination plans at municipal, regional and national levels. Interoperability and emergency communications should be incorporated in these plans.

The RCMP advocates as much flexibility as possible in allowing various applications to exist in the band, including aeronautical mobile use and fixed links in support of 4.9 GHz system as long as it does not disrupt radio astronomy and can coexist safely with other broadband mobile technologies and applications.

We commend Industry Canada for their active and timely action in making available spectrum for future public safety broadband applications.

We urge Industry Canada to move forward quickly on the adoption of the policy and service parameters that will allow the implementation of these applications in Canada.

Sincerely,



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