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October 31, 2005

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

Subject: WCTC Response to Canada Gazette Notice DGTP-005-05 – Proposed Spectrum Utilization Policy, Technical and Licensing Requirements for Broadband Public Safety in the Band 4940- 4990 MHz

Dear Mr. Shaw:

The Western Canada Telecommunications Council (WCTC) is pleased to respond to Canada Gazette notice DGTP-005-05.

WCTC is a non-profit society that has served as a forum for the discussion of issues affecting telecommunications in Western Canada since 1953. WCTC is a member of RABC and serves to represent the many private and government organizations in Western Canada which have an interest in matters of usage, regulation or standardization of telecommunications facilities, equipment, and radio spectrum.

WCTC supports the RABC's responses to all of the issues raised in this Gazette notice. In particular, we support the proposed bandplan, which is harmonized with that of the US, and a sub-allocation plan that will enable coordinated usage of this spectrum by multiple public safety agencies in the same geographical area.

In the heavily populated areas of southwestern British Columbia, the majority of public safety agencies utilize shared radio systems operated by regional bodies:

- E-Comm – Emergency Communications for Southwest BC, within the Greater Vancouver Regional District
- Capital Region Emergency Service (CREST) Telecommunications, within the Capital Regional District (Victoria area)

In future, it is expected that these organizations will consider the provision of a variety of broadband wireless services utilizing the 4.9 GHz band on a region-wide basis. However, we also expect that individual municipalities in the same areas will also wish to make use of this band for the deployment of services to support their local police, fire, public works or

emergency management functions. This would be in addition to any usage by federal or provincial agencies such as the RCMP (with its municipal, provincial and federal policing mandates) or the BC Ambulance Service (which has a province-wide operational mandate).

As result, we can easily foresee a situation where four or more overlapping licenses for this band be issued to bona-fide Category 1 public safety agencies in any given area. For this reason, we believe it is important that the Department carefully consider the methodology to be used to coordinate the ongoing usage of this band.

WCTC believes that a regional planning process should be established and formally sanctioned by the Department for this band and other public safety bands such as the newly-established 700 MHz band.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Michael Webb".

Michael Webb, P. Eng.
Director - WCTC