



To: Director General, Telecommunications Policy Branch
Industry Canada
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From: Director General, Infrastructure Engineering and Development
Royal Canadian Mounted Police
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**Royal Canadian Mounted Police Comments on
Canada Gazette, Part I, September 2, 2009, Consultation Paper on Low-power
Licensed Radiocommunication Devices, Including Wireless Microphones, in the
Band 698-806 MHz DGTP-011-09**

The Royal Canadian Mounted Police commends the Department for its timely proposal to restrict the utilization of low power devices in the 698-806 MHz band or better known as the 700 MHz band.

The Department must act rapidly in order to prohibit the use, manufacture and sale of these devices in Canada.

The removal of the low power devices, licensed and unlicensed, from the band will ensure that the operations of new and existing public safety mission-critical systems are not hampered. It will also ensure that when parts of the 700 MHz band earmarked for future mobile broadband applications are released in Canada for new public safety and commercial systems, the radio spectrum will have been cleared.

Canada must harmonize its policy implementation date as closely as possible to the United States that has a similar undertaking. It is suggested that the United States may not totally ban the manufacture of these devices as it may allow the manufacturing of devices for exportation purposes only. These units may be sold in Canada, making it more difficult to clear the 700 MHz band in an effective manner.

Finally, the RCMP feels that a public awareness campaign may be necessary in addition to the other measures proposed by the Department in order to reach as many owners of unlicensed devices as possible, including wireless microphones. Information should be made available on other acceptable frequency bands open to them, as far ahead of time as possible, in addition to information provided from manufacturers/retailers of equipment. This would certainly facilitate the reprogramming or replacement of their existing units in the proposed time frame.

Additional comments are provided below on the specific items proposed by the Department.

Section 3. Use of the Band 698-806 MHz by Low-power Licensed Radiocommunication Devices, Including Wireless Microphones

Decision:

During the period of this consultation and until a decision is made by Industry Canada, the Department will not certify low-power radiocommunication devices that operate in the band 698-806 MHz or issue new licences for their use in this band.

Proposal 1:

1. Given the above activities and potential interference to and from other services in these bands, as well as the nature of public safety operation and its stringent requirements for protection from harmful interference, Industry Canada proposes that no new licences for the operation of low-power radiocommunication devices, including wireless microphones, be issued in the band 698-806 MHz.

The RCMP supports Industry Canada's proposal to make permanent immediately the current moratorium on licensing of low power devices in the 700 MHz band.

Proposal 2:

2. It is further proposed that existing licensees be permitted to continue to operate low-power radiocommunication devices until March 31, 2011, provided that their operation does not create harmful interference to public safety systems operating in the bands 764-776 MHz and 794-806 MHz.

The RCMP supports this proposal. As records of existing licensees of low power devices in the 700 MHz would provide an indication of their location and identity, the Department could forewarn these licensees of the possible interactions with public safety systems deployed in their area. The March 31, 2011 date is supported as it closely aligns with the DTV transition date in Canada (August 31, 2011) that will make available the full bands 764-776 MHz and 794-806 MHz to public safety agencies. There is a close alignment with the time frame proposed by the Federal Communications Commission who also intends to ban these types of devices in the United States. This may prevent the exportation of additional low power devices into the Canadian market place which would render more difficult the clearing of the 700 MHz in a short time frame.

Section 4. Applicable Radio Standard Specifications and Client Procedures Circulars

Proposal 3:

3. It is proposed that no new certification of low-power radiocommunication devices be issued in the band 698-806 MHz.

The RCMP supports Industry Canada's proposal to make permanent immediately the current moratorium on the certification of low power devices in the 700 MHz band.

Proposal 4:

4. In addition, Industry Canada proposes to amend the standards contained in RSS-123 and CPC-2-1-11 such that low-power radiocommunication devices will no longer comply with the standards if these devices operate in the band 698-806 MHz. If the standards are changed in this manner, then Industry Canada would prohibit the manufacture, importing, distributing, leasing, offering for sale or selling of any equipment (even equipment that is certified and meets the existing standards) that does not comply with the proposed standards.

The RCMP supports the proposed revisions to the above standards in order to clearly indicate that the low power devices are no longer permitted in the 698-806 MHz band.

As indicated earlier, the Royal Canadian Mounted Police feels that another method may be necessary, in addition to the measures proposed by the Department herein, to reach as many low power devices users as possible, in particular the unlicensed users. A general public campaign would send a clear message to all; users, manufacturers and retailers that these low power devices must cease operations in the 700 MHz no later than March 31, 2011.

Sincerely,

Luc Filion,
Director, Mobile Communications Services.