



Frank Pappone
Division Chief

William A. Stewart
Fire Chief

William Blair
Police Chief

Bruce Farr
Emergency Medical Services Chief

Emergency Services
Head Quarters
4330 Dufferin St.
Toronto ON M3H 5R9

Tel: 416 338-9500
Fax: 416 338-9060

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Director General,
Spectrum Engineering Branch, Industry Canada,
1943B, 300 Slater Street, Ottawa,
Ontario, K1A 0C8.

Canada Gazette Notice DGTP-011-09 — Consultation Paper on Low-power Licensed Radiocommunication Devices, Including Wireless Microphones, in the Band 698-806 MHz

The City of Toronto's Emergency Services welcomes the opportunity to provide comment on Canada Gazette Notice DGPT-011-09, *Consultation Paper on Low-power Licensed Radiocommunication Devices, Including Wireless Microphones, in the Band 698-806 MHz*.

Since 2000 the City of Toronto has operated a common voice radio system infrastructure utilizing approximately 7000 terminals for its Emergency Services agencies. Collectively, Toronto Police Services, Toronto Fire Services and Toronto Emergency Medical Services form one of the countries largest Public Safety groups representing over 10,000 first responders. Because of this common interest and the potential impact of any regulatory spectrum policies, this correspondence reflects the collective position of all three agencies.

We are confident that the Department views potential interference to Public Safety from devices or technology deployed within the same band with a renewed commitment.

1.0 Intent/Background

The City of Toronto Emergency Services are always concerned with matters that impact spectrum availability and usage by public safety. Recent developments in the 700Mhz band are of particular interest to us as we prepare our migration into this band for our most critical voice communications. We are therefore supportive of this consultation and once again we acknowledge the admirable work the Department has done to recognize and accommodate the needs of Public Safety in Canada.

The ability of the Department to distinguish "public safety operation and its stringent requirements for protection from harmful interference" is paramount in establishing policy.

2.0 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.

Proposals:

- 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.*
- 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 City of Toronto's Emergency Services applaud the Departments decision to mitigate harmful interference and are fully supportive of Proposal 1.

We cannot however, support Proposal 2 as written. We feel the Department is underestimating the effort required to clear the market of these devices. The March 31 2011 date must be revisited particularly in areas that have deployed, or plan to deploy in the 700Mhz band. We would recommend an August 31 2010 date, a full twelve months prior to the shut down of analog television transmission.

Proposals:

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

We are fully supportive of Proposals 3 and 4.

Regards,



Frank Pappone
Division Chief
Information and Communications Systems
Toronto Fire Services