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**Re: Government of Ontario Comments related to
Canada Gazette Notice DGRB-002-06**

The Government Mobile Communications Office, on behalf of public safety radio communications users within the Government of Ontario, is pleased to respond to the Proposal for Spectrum Licence Fees for the Broadband Public Safety Band at 4.9 GHz, as outlined in the Canada Gazette Notice DGRB-002-06.

We represent the various Ontario Government users of public safety radio network in Ontario, which provides service to organizations such as the Ontario Provincial Police, Ministry of Health and Long-Term Care (Land-Ambulance), Ministry of Transportation Highway Operations and Carrier Enforcement, Ministry of Natural Resources, Ministry of Community Safety and Correctional Services, Office of the Fire Marshal, etc., and are pleased to provide the following comments.

We have calculated the spectrum licence fees for network coverage for the population of Ontario, based on Statistics Canada 2005 census data and using \$ 0.004166 per 50 MHz per population, at approximately \$52,248 per annum. We also understand that where coverage is not available from future 4.9 GHz systems, that portion of the population is excluded from the calculation the resultant annual licensing fee would be adjusted downward from the calculated \$52,248 value.

While we generally find these licence fees to be reasonable, we do have the following comments:

- 1) We would request clarification that a 10-year licence term is not an absolute requirement, and that licensees could, at any time over the course of the 10 year period, cancel their licence without additional fees / penalties.

- 2) Although the licence fee appears to be low when compared to other commercial licences, this frequency band is non-exclusive (shared) spectrum which is to be utilized by Canadian Public Safety agencies. These agencies do not operate on a cost-recovery / profit-driven basis. As such, the comparison of proposed Canadian Public Safety licensing fees to licensing of commercial services, and on an exclusive basis, such as PCS / Cellular, MCS, LMCS or WSC is not, in our opinion, appropriate.

With regards to proposed service standards for licensing in this band, we believe that the typical four-week service standard from initial submission to final authorization of a licence is adequate to meet the needs of the Government of Ontario for this 4.9 GHz band.

We thank you for the opportunity to comment on the proposed licensing fee for the new 4.9 GHz band.

Regards,

John-Paul Hayward
Head, Telecommunications Branch,
ISERV ONTARIO, Ministry of Government Services