



Canadian Electricity Association
Association canadienne de l'électricité

April 25, 2002.

Director General, Telecommunications Policy Branch
Industry Canada
300 Slater Street
Ottawa, Ontario, K1A 0C8

Dear Mr. Helm:

The Canadian Electricity Association Telecommunications Task Group thanks Industry Canada for the opportunity to participate in the consultation of DGTP-001-02 - SP 3-30 GHz. The comments below were also submitted to the RABC.

Section 2.2 Low and Medium Capacity Fixed Systems

For low capacity systems in the 7 GHz band (7125-7725 MHz), CEA TTG confirms that much congestion is experienced by the actual users in the transition from analogue to digital systems and that the increasing users requirements in the 7GHz band will not release spectrum as initially anticipated. It is thus recommended to maintain the actual use and channel arrangement as described in the radio policy and Standard Radio System Plan 307.1.

Section 2.4 Priority Use

"The Spectrum Policy Framework document outlines spectrum uses which will be granted high priority and support in the access and use of the radio spectrum. These priority uses include radio communication systems vital to sovereignty, national security and defense, law enforcement, public safety and emergency services. Also, essential government operations, and other agencies providing critical services to the general public, such as electric utilities, will have high priority in use of the spectrum." as indicated on page 9 in the Spectrum Policy Framework for Canada (SPFC) document. This is required to **recognize other needs, such as public and investor owned electric utilities requiring highly reliable microwave radio systems to control and protect specific networks and public safety and security agencies needing particular autonomy.**

Section 7.0 Services in the 8 GHz Frequency Range

The 7725-8275 MHz band shall become accessible and rearranged to provide spectrum relief to the L2 (lower 2 GHz) and 7 GHz bands users.

We hope that these comments will add to the harmonization of the noted parts of the spectrum.

Yours truly,
CANADIAN ELECTRICITY ASSOCIATION

Don Diack, Interim Chairman
Telecommunications Task Group