



December 19, 2005

Mr. Fernand R. Léger  
Director, Spectrum and Radio Policy  
Telecommunications Policy Branch  
Industry Canada  
300 Slater Street, Room 1514A  
Ottawa, ON K1A 0C8

Re: *Consultation on a Renewed Spectrum Policy Framework for Canada and Continued Advancements in Spectrum Management*, Canada Gazette Part 1, May 2, 2005, Notice No. DGTP-001-05

Dear Mr. Léger

Members of the Canadian Electricity Association (CEA) have reviewed Notice No. DGTP-001-05, *Consultation on a Renewed Spectrum Policy Framework for Canada and Continued Advancements in Spectrum Management*. While we affirm our support for the submission of the Radio Advisory Board of Canada on this matter, we would like to take this opportunity to underscore concerns specific to our industry. We apologize for submitting a late response and thank the ministry for kindly giving consideration to our comments.

Utilities use point-to-point and point-to-multipoint radiocommunications to detect, isolate, and clear fault conditions on transmission lines, bring generating units on and offline, and monitor and control voltage parameters and equipment conditions. Fixed and mobile radiocommunications are also essential for dispatching crews and materials, efficiently coordinating repair and restoration activities, and responding promptly to crisis situations.

We wish to take this opportunity to emphasize that the electricity production and transmission systems have been classified as 'critical infrastructure' by the Department of Public Safety and Emergency Preparedness. The provision of uninterrupted electricity is an essential service upon which the security and well-being of Canadians depends, a dependency made evident during the August 2003 blackout in Ontario and the Northeast & Midwest United States. At a time when transmission grids in Canada are operating at near capacity limits, the industry requires priority access to spectrum to monitor and control the grid securely and effectively.

Moreover, it has been demonstrated in the past that utilities cannot fully rely on commercial service providers to meet required reliability levels, during normal or emergency operations. At critical moments, second party systems often become heavily congested and even fail altogether. By contrast, the utilities' own internal networks include robust and built-in redundancy, backup, and recovery mechanisms, which perform at levels that commercial carriers do not find cost-effective to match. Given that a highly reliable communications network is a condition for sound critical infrastructure management, the electricity industry needs to maintain elevated status as a spectrum user.

CEA recommends that Industry Canada, when considering and reviewing spectrum assignments, treat the electric power industry on par with level (b) public safety institutions, as referred to in section 11.9 of the consultation paper. In addition, the proposed new policy guideline 8, referred to in section 6.2.3.2, should include "critical infrastructure entities, such as energy systems and utilities" among its listing of priority access users, whose radiocommunications operations are vital to maintaining national safety and security. CEA also supports Industry Canada's efforts to promote service



**Canadian Electricity Association**  
**Association canadienne de l'électricité**

[www.canelect.ca](http://www.canelect.ca)

interoperability between public safety land mobile systems and stresses the need for our industry to play a lead role in identifying interoperability conditions.

Thank you again for the opportunity to comment and we hope that our submission will inform the development of the ministry's spectrum policy framework.

Sincerely,

Eli Turk  
Vice-President, Government Relations, Canadian Electricity Association