**Input to Industry Canada**


Regarding:

**Notice No. DGTP-001-05**

**"Consultation on a Renewed Spectrum Policy Framework for Canada and Continued Advancements in Spectrum Management"**


**Comments of Motorola Canada Limited**


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## INTRODUCTION

Motorola Canada Limited (Motorola) appreciates this opportunity to respond to Industry Canada's "Consultation on a Renewed Spectrum Policy Framework for Canada and Continued Advancements in Spectrum Management".  The intent of this response is not to repeat comments provided by our industry associations or the Radio Advisory Board, but rather, to provide additional comments.

Canada, through Industry Canada has had over the years an excellent spectrum management program which has been updated at various times to meet the changing environment.  Motorola commends the Department for implementing this consultation and supports its proposals to modernize its spectrum program.  We are particularly encouraged by the renewed focus on access to spectrum by public safety agencies and national security, interoperability of public safety systems, and, on timely access for spectrum.

<u>COMMENTS</u>

*PART A – REVISION TO THE SPECTRUM POLICY FRAMEWORK FOR CANADA*

*4. Context for the Revision of the Framework*

Industry Canada's rationale for this review is in line with Motorola's own views on the impact of the changing technology and market demands on the regulatory requirements. Motorola encourages the Department to take into account our input into the Telecom Policy Review Panel, specifically our answers to the questions in Section A of that response, which describes this changing situation. In addition recent global events such as terrorist activities and natural disasters support the need for this review.

*6. Proposed Changes to the Framework*

*6.1.2 Proposed Changes to the Core Objectives*

Motorola urges the Department to include an objective that promotes timeliness and links it with Canadian's needs and expectations. We agree with the department that timeliness is important. We would argue that it is critical for allowing Canada to be competitive internationally, improving productivity in Canada, and supporting the desired outcomes and other core objectives. Timeliness is relative and dependant on the application and industry pace, e.g. product / system life cycle or rate of change in the industry. The resulting strategies would require:
- Methods of measurement
- Process for improvement
- Consensus between government and the Canadian stakeholder as to what the acceptable terms of timeliness are

*6.2 Policy Guidelines*

Motorola supports the new Policy Guidelines with the following comments

*New Policy Guideline 1 – Allocation of Frequency Bands to Radio Services*

Motorola supports this PG and notes that in future users will benefit from the ability to roam between applications assigned to specific "Services" (Mobile, Fixed, Broadcasting and etc.) and between networks (currently designated as Mobile, Fixed, Broadcasting and etc.) unaware and seamlessly. Motorola sees this as a critical component of future ICT solutions. This is also covered in further detail in our response to the Telecom Policy Review Panel's consultation in Section A.

*New Policy Guideline 2 – Designation of Spectrum to Usage*

See comments on PG 1

*New Policy Guideline 7 – Timely Release of Spectrum*

Motorola supports this PG and reiterate are earlier comments regarding the need for rigorous measurement of timeliness and consensus on goals for timeliness.

*New Policy Guideline 8 – Priority Communications Services*

Motorola agrees with this PG and notes that cost to acquire spectrum would be one element of access.  Auctions, for example, have prohibited public safety from obtaining access to spectrum due to the resulting high cost of the auctioned spectrum.  When it is determined that it is best to auction a certain band there may need to be additional processes to allow priority communication services access to those bands as well at a reasonable cost.

*New Policy Guideline 12 – Increasing Spectrum Utilization*

While we support the SP to promote spectrum efficiency we reiterate Motorola's comments to the FCC that "…efficient spectrum use is a much broader and more complex issue than merely the amount of information that is transmitted over a finite amount of spectrum.  Instead, efficiency should be measured by how well spectrum use meets the requirements of spectrum users, i.e., economic efficiency, which is dependent upon operational efficiency as well as spectrum efficiency.  Information must be distributed reliably throughout the area where it is needed without undue degradation.  If not, communications must be repeated, leading to inefficient and possibly even unsafe situations.  Achieving the highest spectrum efficiency does not necessarily result in the highest operational efficiency."[1]  Motorola also urges the Department to apply this policy to other bands including those for broadcast use.

*11.1  Harmonized Use of the Radiofrequency Spectrum*

*(2)  How can Canadian interests be further advanced in the international fora responsible for developing standards and regulations for new wireless technologies and services?*

Motorola believes that Canada has done a commendable job in this area and should continue.  In addition to harmonizing our spectrum with other countries, promoting Canada's spectrum plan both regionally and nationally will further support the benefits listed in the consultation under Section 11.1.  For example promoting the use of part of the 700 MHz band for public safety within CITEL countries.

*11.9  Access to Spectrum for Public Safety Services*

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[1] Comments of Motorola Inc. to the US FCC  in the matter of the Spectrum Policy Task Force Report, ET Docket No. 02-135

*(21) Should the Department require that the licensing process for public safety systems consider the needs of the broader public safety community over larger geographical areas?*

For matters of interoperability, yes, including at the border with the US.

*(22) Should the Department adopt standards which include the aspect of interoperability of public safety mobile systems?*

Industry Canada is aware of the open standard (APCO 25) which is embraced by a number of vendors and public safety agencies in the United States. This set of standards, developed by the public safety community, provides for interoperability between public safety systems.  Motorola recommends that the Department adopt this set of standards for Canada.

    a. *Should these standards be open standards to ensure that equipment from various vendors can operate on the same system?*

Yes

    b. *Should the Department, through its regulations or licensing process, ensure that interoperability is included as an aspect of the design of public safety systems?*

Yes