



September 6, 2005

Mr. Larry Shaw  
Director General Telecommunications Policy  
Industry Canada  
300 Slater Street  
Ottawa, ON  
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**Subject: The Railway Association of Canada's response to Canada Gazette Notice: DGTP-001-05, Consultation on a Renewed Spectrum Policy Framework for Canada and Continued Advancements in Spectrum Management**

Dear Mr. Shaw:

The Railway Association of Canada (RAC) welcomes the opportunity to provide comment on Industry Canada Gazette Notice No. DGTP-001-05 published on May 15, 2005. We commend Industry Canada on their foresight in re-examining this key matter.

As an active member of the Radio Advisory Board of Canada (RABC), the RAC has contributed to the development of their response to the above mentioned Canada Gazette Notice and endorses it for the most part. The Association, however, would like to emphasize two key aspects of Spectrum Management that are particularly important to the railway industry and that are missing from the consultation document: Spectrum Management Partnerships with the private sector and Electronic Service Delivery.

The railway industry is currently in the midst of a period of economic resurgence, much of which dates back to a series of beneficial regulatory and policy changes initiated in the late 1980s and 1990s. One of these beneficial changes was the issuance of a spectrum licence to the RAC by Industry Canada, which provided our industry with more flexibility in the organization, expansion and deployment of our radio networks. In order to manage the railway spectrum efficiently, the RAC relies almost exclusively on the electronic exchange of information over the Internet with Industry Canada.

We understand that the next Spectrum Policy Framework should reflect the new realities of spectrum management in Canada and include a series of objectives and policy guidelines aimed at modernizing the spectrum management program. To this effect, we were rather surprised to find no reference to the high profile *Government On-Line* initiative in either Part A or B of the consultation document and very little reference to electronic data exchange between the department and its clients (with the exception of a timid reference to the electronic filing of licence applications). Furthermore, there is no mention of the concept of Spectrum Management Partnerships; as the Department moves out of the traditional, micro-managing

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radio site licensing approach to more flexible radio authorizations such as spectrum licences, the licensee becomes also a partner and must take on some spectrum management tasks to ensure that its network is properly planned and coordinated.

As an active Industry Canada partner in spectrum management, the RAC believes that Spectrum Management Partnerships with the private sector should be defined in the next framework and that these partnerships should be recognized as a key element of the Program's modernization process. Also, we strongly believe that Industry Canada should make a firm commitment in the next Policy Framework to provide Partners with efficient electronic tools and good access to government-managed databases, and thus allow them to perform their spectrum management tasks. We recognize that considerable progress has been achieved since the late 90s but few regulatory and policy changes have yet to be made, especially in the field of unrestricted access to the Assignment and Licensing System (ALS) database.

Thank you again for giving us the opportunity to participate in this important consultation process. For further information, please contact Mr. Daniel Lafrenière, Manager, Radio Spectrum, at (613) 564-8102, or by e-mail at [daniell@railcan.ca](mailto:daniell@railcan.ca).

Sincerely,



Bruce R. Burrows  
Acting President & C.E.O.

cc: Mr. Jan Skora, Director General, Radiocommunications & Broadcasting Regulatory Branch,  
Industry Canada  
Mr. Mike Lowenger, Vice-Pres., Operations & Regulatory Affairs, RAC  
Mr. Daniel Lafrenière, Manager, Radio Spectrum, RAC

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