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November 8, 2004

Director of Spectrum and Radio Services  
Industry Canada  
300 Slater Street  
Room 1611A  
Ottawa, Ontario K1A 0C8

Comments to: Canada Gazette Notice DGTP-008-04  
Revisions to Spectrum Utilization Policies in the 3-30 GHz Frequency Range and  
Further Consideration  
Released October 1, 2004

On behalf of the Halifax Regional Fire & Emergency, we completely support the proposal by Industry Canada to designate the band 4940-4990 MHz (the 4.9 GHz band) for fixed and mobile service use in support of public safety.

Halifax Regional Fire & Emergency coverage area is 5,577 sq. kms with a population of 358,000. We provide this service to the Halifax Regional Municipality with 461 Career Staff and approximately 800 volunteer members.

Our members need additional spectrum to implement newly emerging mission critical broadband applications. We agree that this 4.9 GHz spectrum is urgently needed by Canada's public safety agencies to support advanced broadband technologies enabling high-speed wireless transfers of large files, images and video, as well as intranet access, at specified locations or at ad hoc on-scene command centers. Our agencies require dedicated spectrum for mission critical broadband applications for the same reasons that we depend on narrowband voice systems today.

Because the United States has allocated this same band to public safety, vendors are starting to develop product which leverages consumer broadband technologies from their adjacent 5 GHz unlicensed band, yet meets the specific requirements of public safety. Similar access to 4.9 GHz in Canada means compatible equipment with U.S. agencies, and greater availability of product at lower cost due to vendor economies of scale.

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We urge Industry Canada to initiate a follow-up consultation to define service rules and technical specifications and to make a final decision no later than year-end 2005. Our country's public safety community needs speedy access to 4.9 GHz advanced broadband applications to fulfill our increasingly difficult task of protecting our citizens and officers who serve them.

Sincerely,

  
Michael E. Eddy  
Chief Director