



April 26, 2002

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

Dear Mr. Helm,

**Re: Canada Gazette, Part 1, Publication Date 2002-01-18
Notice No. DGTP – 001 – 02
Consultation on Revisions to the Spectrum Utilization Policies in the
3-30 GHz Frequency Range**

I am submitting this letter on behalf of the Intelligent Transportation Systems Society of Canada (ITS Canada) to comment on your proposal to designate 75 MHz of spectrum for intelligent transportation systems (ITS) in the band 5850-5925 MHz. ITS Canada consists of members from the public and private sectors who share a common interest in promoting the application of ITS in Canada. It includes Transport Canada, provincial transportation ministries, municipalities, system integrators and manufacturers of ITS equipment including dedicated short-range communication (DSRC) transponders and readers.

We have reviewed the section 6.0 of the document "Consultation on Revisions to Spectrum Utilization Policies in the 3-30 GHz Frequency Range" which concerns the use of intelligent transportation systems in the band 5850-5925 MHz. It is our view that this section is an accurate portrayal of the need and opportunity to allocate 75 MHz of spectrum in this band for ITS applications related to safety and efficiency of Canada's transportation infrastructure. We commend your initiative in proposing to make this designation and confirm the support of ITS Canada and its members for this policy revision.

You have requested comments with respect to three issues.

- (a) ITS Canada supports the requirement to add a mobile allocation to the band 5850-5925 MHz to accommodate ITS applications. The U.S. FCC made this designation in 1999. We believe there is now an urgent need to harmonize the use of this band for ITS applications in both countries. This is essential to facilitate the safe, secure and efficient movement of vehicles throughout North America in pursuit of trade and tourism. A number of members of ITS Canada are now working to develop the technology, standards and specific applications that will be used to exploit this band.

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- (b) ITS Canada has met with Industry Canada officials and with representatives of a major existing user of the 5850-5925 MHz band to explore options to minimize the impact of ITS on existing microwave users in the band. As a result, we have begun to identify the location, directional, power level and channel usage factors that will enable us to share use of the band. This dialogue is at an early stage but we are confident it will lead to success. The time frame for the introduction of ITS applications will be an important factor and this is forecast to be of the order of 3 years for the technologies now under development. Discussions, led by ITS America, are underway to develop a plan for channel usage within the band that will optimize its use for ITS applications and accommodate existing Canadian users of the band. A copy of a draft plan for ITS use of the band including the draft plan for channel usage was made available to your officials at a meeting in Toronto on April 11, 2002.
- (c) ITS Canada has no position on whether or not a moratorium on the licensing of new fixed systems in portions of the band is required at this time. This is an issue that can be addressed as part of the dialogue mentioned in comment (b) above.

We are pleased to have this opportunity to advise Industry Canada of ITS Canada's support for your proposed designation of the 5850-5925 MHz band for ITS mobile applications and we thank you for your consideration.

Yours sincerely,



Joseph K. Lam
Chairman

Cc: W. F. Johnson, ITS Canada
C. Rayman, ITS Canada
S. Spencer, Transport Canada