

Radio Advisory Board of Canada

Conseil consultatif canadien de la radio

File: 3400-3/30

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

**Radio Advisory Board of Canada Response to DGTP-008-04, *Gazetted* 2004-10-02
SP 3-30 GHz Revisions to Spectrum Utilization Policies in the 3-30 GHz Frequency
Range and Further Consultation**

Attached is the Radio Advisory Board of Canada's response.

This response was prepared by a working group of the Fixed Wireless Communications Committee. It is submitted in MS Word 2002 format.

The response was balloted and approved by RABC sponsor members as follows:

Sponsor	
ACFC (Railway Association)	-
APCO Canada	Ac
Bell Telecom Group	A
CABC	-
Canadian Assoc. of Broadcasters	Ac
Canadian Broadcasting Corp.	-
Canadian Cable Telecom Assn.	A
Canadian Electricity Assn.	B
Canadian Wireless Telecom Assn.	Ac
Communications Research Centre	-

Department of National Defence	A
Electro-Federation of Canada	A
Model Aeronautics Assn. Of Canada	-
NAV CANADA	B
Ontario, Gov't, Sol Gen, OPP	-
Radio Amateurs of Canada	-
Rogers Wireless	-
Royal Canadian Mounted Police	B
TELUS	Ac
Western Canada Telecom Council	B

A= Approve, Ac = Approve, with Comment, B = Abstain, Dc = Disapprove, with Comment, D = Disapprove

Members were offered a general comment, with which several agreed:

The draft response to DGTP-008-04 says at page 3, "It should be noted that on a similar exercise the FCC had reviewed some eight potential definitions for rural areas and settled on a figure of 100 persons per square mile or less (which equates to about 270 persons or less per square kilometre)."

Actually, 100 persons/sq-mi = 39 persons/sq-km, since 1 sq-mi = 2.58999 sq-km. Therefore, the IC proposal for a "rural area" definition has a population density about 10 times that of the FCC's definition.

Does RABC really want to agree with IC's proposed definition of "rural area" as being 400 persons/sq-km or less? If so, many of our cities will qualify as "rural areas". Here are the population density figures for some sample CMA's, based on the 2001 Census:

CMA	Density (persons/sq-km)
Ottawa	246
Winnipeg	162
Halifax	65
Edmonton	100
Calgary	187

Sponsor members comments, *which form part of the Board's response*, are:

- Association of Public Safety Communications Officials (Canada)

We agree with the comments regarding the population density formula. The proposed numbers are too high and need to realistically reflect our communities as they really are.

We respectfully offer the comment that public safety communication needs have to be considered at all times, especially when considering what is currently "uncharted" or unregulated spectrum.

- Canadian Association of Broadcasters

Please refer to the RABC's response to Section 5.3.7. At this time, we cannot support the Board's conclusion that Industry Canada's proposed definition of a "rural" area (i.e. that the population density must be ≤ 400 persons per sq-km.) is a reasonable one. By this definition, some major Canadian CMAs such as Ottawa, Calgary, Edmonton, Winnipeg and Halifax might be considered "rural" because their CMA's cover very large areas, producing average population densities well below 400/sq-km. While we understand that this proposal was made in the context of LMCS services in the 27.35-28.35 GHz band, regulatory definitions, once created, tend to be adopted in other bands as well.

The RABC response notes, "... the FCC had reviewed some eight potential definitions for rural areas and settled on a figure of 100 persons per square mile or less" (which equates to about 270 persons or less per square kilometre)." In fact, the US figure equates to 39 persons per sq-km, further demonstrating the unsuitability of the definition selected by Industry Canada – a figure which is about ten times the density value used by the FCC.

- Canadian Wireless Telecommunications Association

CWTA notes that while the Department's proposed definition of "rural area" is similar to one used by Statistics Canada, it does not include all relevant qualifiers. As a result, the proposed definition may not be workable. CWTA recommends a thorough review of the terms rural, remote, and urban for use in all Industry Canada policies and regulations

- TELUS

TELUS shares the concerns expressed in this email above concerning the definition of the rural/urban split and the associated densities. These densities should be much more with the FCC definition. It is my understanding that on the W/G calls this was the general impression.

Yours truly



E.R. (Ted) Campbell
General Manager
For Paul Frew
President