

The Honourable Tony Clement
Minister
Industry Canada
C.D. Howe Building
235 Queen Street
Ottawa ON K1A 0H5

Dear Minister:

We are writing on behalf of our organizations, which represent emergency services providers in the Province of Ontario, with respect to the Industry Canada consultation paper, *Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects Related to Commercial Mobile Spectrum (Canada Gazette No. SMSE-018-10)*.

As Canada moves from analog to digital television and the reallocation of radio spectrum in the 700 MHz range, emergency providers in Ontario believe that there is a historic opportunity to significantly enhance public safety communications interoperability with the United States and equip our emergency responders not just in Ontario but across Canada with the correct suite of technologies they need to do their jobs.

We respectfully urge Industry Canada to assign 20 MHz of dedicated spectrum to public safety in the 700 MHz band.

At present, public safety wireless networks in Canada are not capable of delivering mission-critical, real-time, multimedia content to public safety practitioners. Although some Canadian public safety agencies use commercial networks to support their data requirements, existing commercial networks have significant limitations when used to support the mission-critical multimedia applications that public safety providers need today and tomorrow.

It should be noted that commercial networks are not designed to the reliability standards of public safety providers. Such networks tend to be unavailable and overwhelmed in situations when public safety users require access the most – in the earliest moments of emergencies and major disasters. Commercial carriers should not be expected to be inclined to provide public safety with the required priority access and pre-emption capability, as this conflicts with their primary objective of maximizing profitability for their shareholders. This leads directly to the need for a dedicated public safety spectrum allocation of 20 MHz in the 700 MHz band.

Public safety communities across Canada and the United States have been working together to maximize functional interoperability between bordering Canadian provinces and territories and American states. The Obama administration, following on from the President's 2011 State of the Union

Address, has announced that it will support legislation that allocates a full 20 MHz of spectrum to the US public safety community.

While there are significant challenges with interoperability of communications in other spectrum bands, aligning 700 MHz band spectrum allocations for public safety is entirely feasible and presents a historic opportunity to enhance markedly our cross-border communications interoperability.

Finally, as Ontario's detailed response to the consultation questions (sent under separate cover indicates, independent technical studies, including one jointly commissioned by the Canadian Police Research and the Communications Research Council) clearly demonstrates that a full 20 MHz of spectrum in the 700 MHz band is needed to support projected public safety user demands over the next decade. This supports our position that Industry Canada should allocate 20 MHz of spectrum to public safety and not auction it for commercial use.

Thank you for considering the views of Ontario emergency service providers on this important issue.

Yours sincerely,



Chief Robert Herman
Thunder Bay Police Service
and President OACP



Chief Tim Beckett
Kitchener Fire Department
and President OAFCA



Chief Norm Gale
Superior North EMS
and AMEMSO President

