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February 16, 2011

**Manager
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Industry Canada
300 Slater Street
Ottawa Ontario K1A 0C8
Sent via email: Spectrum.Engineering@ic.gc.ca**

Subject: Canada Gazette, Part 1, December 4, 2010, Gazette Notice No. SMSE-018-10 – Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects Related to Commercial Mobile Spectrum

Dear Madam/Sir:

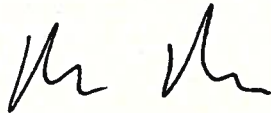
1. The Department has issued a consultation paper titled **Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects Related to Commercial Mobile Spectrum** ("the Consultation Paper"). In the Consultation Paper, the Department has invited comments on the use of the 700 MHz band by commercial mobile services.
2. The Federation of Canadian Municipalities (FCM) appreciates the opportunity to provide comments on the above-noted consultation.
3. FCM supports the call of the Emergency Medical Services Chiefs of Canada, the Canadian Association of Fire Chiefs and the Canadian Association of Chiefs of Police to secure dedicated 700 MHz spectrum for public safety broadband.
4. FCM has been the national voice of municipal government since 1901. With more than 2,000 members municipalities FCM represents the interests of municipal governments on policy and program matters that fall within federal jurisdiction. Members include Canada's largest cities, small urban and rural communities, and 18 provincial and territorial municipal associations. As a national organization, FCM is dedicated to improving the public safety of Canadians.
5. In December 2010, the presidents of the Emergency Medical Services Chiefs of Canada, the Canadian Association of Fire Chiefs and the Canadian Association of Chiefs of Police announced the creation of the Tri-Services Special Purpose Committee on 700 MHz Broadband for Mission Critical Public Safety Data ("the Special Purpose Committee"). The creation of the Committee was in direct response to the above-noted consultation.
6. FCM supports the Special Purpose Committee in its current efforts to secure dedicated 700 MHz spectrum for public safety broadband, including strongly opposing any potential Industry Canada commercial auction of that portion of the spectrum.

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7. FCM urges Industry Canada to reallocate 8 MHz of spectrum (currently assigned to public safety but with unspecified use) to broadband use and allocate an additional 12 MHz of adjacent spectrum to public safety for broadband use. This would result in 20 MHz being assigned for public safety broadband use and a total allocation to public safety of 36 MHz — 20 MHz for broadband and an existing 16 MHz for narrowband/wideband (i.e., voice and low speed data).
8. Allocating 700 MHz spectrum directly to public safety is the only way to ensure robust, modern, reliable public safety grade interoperable networks. First responders and public safety providers must have the right tools to protect and save lives. This includes interoperable communications networks that allow real-time information sharing through high speed video and data. This requires an appropriate, dedicated band of spectrum that can accommodate the everyday needs of police officers, firefighters, and emergency medical personnel, as well as provide excess capacity during times of emergency. The soon to be available 700 MHz block of spectrum provides this opportunity.
9. FCM appreciates this opportunity to share its views with the Department to ensure this one time opportunity for public safety is not lost.

Sincerely,



Michael Buda
Director
Policy and Research

c: The Honourable Tony Clement, Industry Canada
c: Tri-Services Special Purpose Committee on 700 MHz Broadband for Mission
Critical Public Safety Data