

**Ministry of Community Safety  
and Correctional Services**

Office of the Commissioner  
Community Safety

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**Ministère de la Sécurité communautaire et  
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Manager  
Mobile Technology and Services  
DGEPS, Industry Canada  
300 Slater Street  
Ottawa ON K1A 0C8

Dear Sir/Madame:

On behalf of the Canadian Council of Emergency Management Organizations (CCEMO), the provincial and territorial senior officials responsible for emergency management, I am pleased to present this letter in reference to Industry Canada's 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)*.

With the migration from analog to digital television and the reallocation of radio spectrum in the 700 MHz range, we have an historic, one-time opportunity to significantly enhance public safety communications interoperability with the United States and equip our emergency responders with the correct suite of technologies they require.

To this end, and on behalf of CCEMO, I urge Industry Canada to assign 20 MHz of dedicated spectrum to public safety in the 700 MHz band.

Existing 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 existing commercial networks to support their data requirements, the networks have significant limitations to maintain the applications required today and in the future.

Commercial networks are not designed to the reliability standards required by public safety organizations, and, 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. Over the past few years, we have learned that commercial carriers are not inclined to provide public safety with the required priority access and pre-emption capability, as it 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 Canadian provinces and territories and neighbouring US states. The Barack Obama administration recently announced that it will support legislation that allocates a full 20 MHz of spectrum to the US public safety community. Although there are significant challenges with communications interoperability in other spectrum bands, aligning 700 MHz band spectrum allocations for public safety is entirely feasible.

Independent technical studies (including one jointly undertaken by the Centre for Security Sciences and the Communications Research Centre) clearly demonstrate 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 is additional and concrete proof that Industry Canada should allocate 20 MHz of spectrum to public safety and not auction it for commercial use.

Thank you once again for the opportunity to provide input on this critical issue. Correct implementation of the proposed allocation will allow us to collectively resolve historic interoperability challenges and exercise due diligence on behalf of the public we represent. CCEMO believes that the availability of wireless technology to provide mission critical multimedia services to public safety personnel during emergencies is something that the Canadian public deserves and expects.

Yours sincerely,



Daniel Hefkey  
Commissioner, Community Safety  
Chair Canadian Council of Emergency Management Organizations

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