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Adrian Florea  
Manager, Mobile Technology and Services  
Industry Canada  
Mobile Services Engineering Directorate  
300 Slater Street  
Ottawa, Ontario  
K1A 0C8

Dear Mr. Florea:

I am writing to you in my capacity as co-chair of the SOREM Interoperability Working Group on the subject of 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)*.

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

To this end and on behalf of the pan-Canadian body of senior emergency professionals that I represent, 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 currently use commercial networks to support their data requirements, existing commercial networks have significant limitations when used to support the mission-critical multimedia applications that the public safety community needs today and in the future.

Commercial networks are not designed to the reliability standards public safety requires 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 these conflicts with their primary objective of maximizing profitability. This leads directly to the need for a dedicated public safety spectrum allocation of 20 MHz in the 700 MHz band.

Furthermore, the public safety communities across Canada and the United States have been working together to maximize functional interoperability between bordering Canadian provinces and territories and US states. Although 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 would greatly enhance cross-border communications interoperability.

The collective view of the SOREM Interoperability Working Group is that the absolute minimum that the public safety community in Canada should settle for is 10 + 10 MHz (20 MHz in total). The White House and the Obama administration, following on from the President's recent State of the Union Address, have announced that they will support legislation that allocates a full 20 MHz of spectrum to the US public safety community.

Finally, we have seen the findings of independent technical studies (including one jointly commissioned by the Canadian Police Research and the Communications Research Council) which demonstrate with hard fact 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 proof positive that Industry Canada should allocate 20 MHz of spectrum to public safety and not auction it for commercial use.

Thank you for the opportunity to provide input on this historic and critical issue. Correct implementation of the proposed allocation will allow us collectively to resolve historic interoperability challenges and exercise due diligence on behalf of the public we represent. Canadians expect and deserve nothing less.

Yours sincerely,

A handwritten signature in black ink that reads "Randy Reid". The signature is written in a cursive, slightly slanted style.

Randy Reid  
National Co-Chair  
Interoperability Working Group