

**Ministry of Community Safety
and Correctional Services**

**Ministère de la Sécurité communautaire
et des Services correctionnels**

Office of the Minister

Bureau du ministre

25 Grosvenor Street
18th Floor
Toronto ON M7A 1Y6
Tel: 416-325-0408
Fax: 416-325-6067

25, rue Grosvenor
18^e étage
Toronto ON M7A 1Y6
Tél. : 416-325-0408
Télééc. : 416-325-6067



CU11-00419

FEB 28 2011

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

Dear Minister:

On behalf of my colleagues, the Provincial/Territorial Ministers Responsible for Emergency Management, I am pleased to write about Industry Canada's 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 with the reallocation of radio spectrum in the 700 MHz range, we have a historic, one-time opportunity to significantly enhance public safety communications interoperability within Canada and with the United States. That is why, on behalf of public safety agencies in Ontario and across Canada, 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 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, since 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.

The Honourable Tony Clement

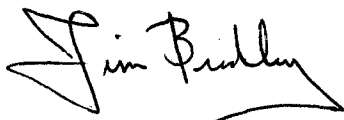
Page two

In addition, the public safety communities across Canada and the United States have been working together to maximize functional interoperability between bordering Canadian provinces, territories and the states. President Obama's administration has announced that it will support legislation that allocates a full 20 MHz of spectrum to the United States public safety community. 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.

Finally, as indicated in Ontario's detailed response to the consultation questions (sent under separate cover), independent technical studies, including one jointly commissioned by the Canadian Police Research and the Communications Research councils, 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 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. The Provincial/Territorial Ministers Responsible for Emergency Management believe that the Canadian public deserves and expects the availability of wireless technology to provide mission critical multimedia services to public safety personnel during emergencies.

Yours sincerely,



Jim Bradley
Minister

c: The Honourable Vic Toews
Minister of Public Safety Canada

Provincial/Territorial Ministers Responsible for Emergency Management