



Public Safety    Sécurité publique  
Canada            Canada

Assistant Deputy    Sous-ministre  
Minister            adjoint

Ottawa, Canada  
K1A 0P8

FEB 25 2011

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Manager, Mobile Technology and Services  
Engineering, Planning and Standards Branch  
Industry Canada  
300 Slater Street  
Ottawa, ON K1A 0C8

Dear Sir or Madam:

Please find enclosed for your consideration a response from Public Safety Canada to Notice No. SMSE-018-10: Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects Related to Commercial Mobile Spectrum, as announced in Canada Gazette, Part I on December 4, 2010. A supporting technical assessment is also enclosed.

Public Safety Canada fully recognizes that it is in Canada's economic interest for the telecommunications sector to continue to progress in order to provide governments at all levels, consumers and the private sector with more convenient, faster and cost effective options. Designing auctions for spectrum utilization that would encourage a competitive Canadian telecommunications market and that would benefit from increased investment and innovation is a recognized priority. That said, current and future public safety and national security requirements are an important consideration based upon the reliance of first responders on voice and data communications for protecting Canadians and Canadian infrastructure.

On behalf of the public safety community, PS requested technical advice from the Defence Research and Development Canada (DRDC) Centre for Security Science (CSS), which conducted a scientific assessment of the 700 MHz spectrum requirements for broadband mobile data communications for public safety use. The findings are based on data provided by the emergency responder community. The analysis applies relatively conservative estimates to increased demand for mobile data communications for public safety and security applications; and relatively aggressive estimates for the rate of technological improvement of spectrum efficiency projected into the future.

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Since the network must be designed to provide connectivity that responders can rely on at all times, the bandwidth requirements must be addressed in the context of how responders intend to use the mobile broadband network during emergencies. The public safety community has come to a consensus that dedicated and reserved spectrum of 20 MHz, at a minimum, in the 700 MHz band is necessary to conduct public safety missions.

A primary consideration to our response remains the issue of harmonisation with United States (U.S.) public safety partners and the need to ensure interoperability along the Canadian and U.S. border corridor. Within the U.S., allocations of the D block to the U.S. Public Safety Spectrum Trust have already occurred and expressions of U.S. political support for an augmentation of that D block allocation have been made. A dedication of the 700 MHz spectrum in Canada to Canadian public safety users will enable that harmonisation in a common spectrum band, while offering strengthened economic benefits associated with the purchase and use of standardised equipment.

In addition, measures to encourage greater competition through market diversification and increased investment could inadvertently pose national security risks or create investigative and intelligence gathering challenges for law enforcement and national security agencies. Safeguards to reduce these challenges and maintain the integrity of the telecommunications network are critical for the protection and prosperity of Canadian industry.

While the first responder needs are extensive and the potential threats to the telecommunications sector are significant, it is important to stress that Public Safety Canada's perspective should not be mistaken as opposition to the 700 MHz auction. Rather, we want to ensure that the public safety perspective is communicated into the consultation process and that appropriate measures are established to ensure domestic and continental interoperability, and to protect this vital sector and those who rely on it.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Lavoie". The signature is fluid and cursive, with a large initial "D" and "L".

Daniel Lavoie

Enclosures: (2)