



6911 South Point Dr  
Burnaby, BC, V3N 4X8

BY EMAIL to [Spectrum.Operations@ic.gc.ca](mailto:Spectrum.Operations@ic.gc.ca)

Feb 28, 2011

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

**Response to Canada Gazette, Part 1, December 4th, 2010, Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects Related to Commercial Mobile Spectrum –SMSE-018-10.**

Dear Sir,

The following are comments of the Utilities Telecom Council of Canada (“UTC Canada”) in relation to the above-referenced Gazette Notice and Consultation Paper.

UTC Canada is an industry association representing Canadian utilities and energy companies, as well as providers of telecommunications infrastructure or information technology services affiliated with these companies. UTC Canada was formed to deal with regulatory issues of common interest and to provide a forum for cooperation on technical and market issues facing its members. UTC Canada is affiliated with the Utilities Telecom Council, a Washington, D.C. based global trade association for electric, gas and water utility telecommunication providers.

UTC Canada understands the main purpose of the Consultation Paper is to seek comments on general policy considerations related to commercial mobile broadband spectrum use, competition issues, harmonization with the evolving U.S. band plans, and generally on the use of the 700 MHz band. The Consultation also addresses spectrum allocation for Public Safety agencies and the comments that follow deal with this aspect of the Consultation.

UTC Canada has had discussions with Public Safety and participated in meetings of The Canadian Interoperability Technology Interest Group (CITIG). Through these meeting and related discussions UTC Canada has gained an understanding of the needs and interests of Public Safety presented by the Tri-Services Special Purpose Committee on 700 MHz Broadband for Mission Critical Public Safety Data.

UTC Canada supports the Public Safety request that at least 20 MHz of paired spectrum (758-768/788-798 MHz), in alignment with 3GPP Band 14, in 5 MHz channels be allocated for the deployment of broadband networks dedicated to Public Safety. In the

public interest, the license fee for dedicated Public Safety spectrum should be not more than the administrative cost to the Department to manage this spectrum. While Public Safety will likely choose to deploy LTE nationwide to ensure interoperability, the Department should not mandate the technology to be deployed.

Furthermore, electric utilities should be re-classified as Public Safety Category 2 allowing them to make use of and support the deployment of public safety broadband networks. There are several examples of Public Safety agencies and electric utilities sharing infrastructure or systems to meet their similar requirements for highly available dispatch communications. The RCMP & SaskPower partnership in Saskatchewan is the flagship example. This successful Canadian partnership is now tri-party and includes the Government of Saskatchewan (Ministry of Corrections, Public Safety and Policing).

To facilitate the growth of such beneficial partnerships the re-classification of electric utilities to Public Safety Category 2 should be included in all of the Departments policies and rules dealing with public safety eligibility. UTC Canada would be pleased to offer evidence of the contribution by Electric Utilities to the protection of Canadian life and property. The Public Safety and Emergency Preparedness Canada “Winter Power Failures” publication provides a good summary of preventative measures to the common power outage health risks [1]. A copy is attached for your convenience.

UTC Canada thanks the Department for the opportunity to comment on these spectrum proposals that are of great interest to our members.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sol Lancashire'.

Sol Lancashire  
Chairman of the Board  
Utilities Telecom Council of Canada

References:

[1] Self-Help Advice Winter Power Failures  
[http://www.publicsafety.gc.ca/prg/em/gds/\\_fl/power\\_e.pdf](http://www.publicsafety.gc.ca/prg/em/gds/_fl/power_e.pdf)