

February 28, 2011

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

Dear Sir

RE: SMSE-018-10 – Consultation on a policy and technical framework for the 700mhz band and aspects related to commercial mobile spectrum

The Yukon Government (the “Yukon”) is pleased to provide comments to Industry Canada in response to the consultation paper referenced above. Our comments have been prepared by Protective Services (PS) within the Department of Community Services.

The Dept of Community Services works to maintain and enhance public safety and security in every community across the Yukon. Within the CS, PS ensures the safety and of Yukon’s communities through a variety of programs and is committed to advancing integrated public safety planning and response in the province by coordinating planning and response capabilities among local governments, First Nations, federal agencies and other public and private sector agencies.

PS represents the Yukon in F/P/T emergency management matters through its participation in SOREM (Senior Officials Responsible for Emergency Management) and has been actively involved in the development and recent approval of the Communications Interoperability Strategy for Canada (CISC) and is associated Action Plan. As identified in the Action Plan, PS is entertaining establishing a Yukon Interoperability Coordinator function that will coordinate development of interoperable public safety communications within the territory.

The 700 MHz broadband spectrum is particularly suited to our geographic and demographic situation in Yukon due to its favorable propagation characteristics in comparison to other bands. For this reason our response will focus on the 700 MHz band.

We have identified affordable high speed telecommunications services as an essential component of a modern economy; affecting their ability to work, operation businesses, acquire resources, receive government services, live safely, and interact socially. The consultation paper also includes a number of questions focused on public safety use of broadband spectrum. In preparing its response to these questions, the Yukon has consulted with a wide range of public safety and public service stakeholders, including other provincial ministries, first responder agencies, critical infrastructure providers.

Although we believe our response accurately reflects the consensus views of all stakeholders consulted, our response should not be construed as making any representation on behalf of organizations external to the Yukon Government PS.

Our consultation with these stakeholders in Yukon has clearly indicated that:

- Demand from public safety and public service agencies for wireless broadband services and the mission critical applications they support will experience growth rates similar to those observed in the broader marketplace (I.E. demand from consumer and business users);
- Commercial wireless broadband services cannot be relied upon by public safety agencies in times of crisis because of the degradation those services experience as a result of excessive demand from commercial users.

The Yukon, therefore, urges Industry Canada to assign dedicated 700 MHz spectrum for the purpose of the building a national, interoperable wireless broadband network for the use of public safety and public sector organizations – those having a mission and mandate to provide critical services for the protection of life and property.

As will be discussed further in the consultation submission, this spectrum assignment must be:

- Sufficient to support projected future bandwidth requirements in major emergency events – a 20 MHz allocation is required based on the analysis discussed in our response;
- Consistent across Canada to enable the construction of a national, interoperable “system-of-systems” based on regionally- or provincially-defined business models and national coordination;
- Harmonized with similar assignments in the United States to enable cross-border interoperability and continental economies of scale in equipment purchase;
- Subject to governance model that ensures the public safety community can directly control the prioritization and use of spectral and network resources, in the absence of commercial influences;
- Licensed for public safety and mission critical public service use at minimal or no cost-in particular, this spectrum should not be licensed through an auction process.

We recognize that allocation of suitable spectrum is only one component of the development of a national wireless broadband network for public safety and that significant work will be needed, once the spectrum is allocated, to develop and implement the required funding and operational models. However, we also believe that the fundamental enablers are in place in Canada and Yukon that will allow such a network to be built and sustained in the long-term such as a national governance framework as outline in the Communications Interoperability Strategy for Canada.

With the recent announcement by the White House¹ of its Wireless Innovations and Infrastructure Initiative, the assignment of the D Block to public safety and the allocation of auction proceeds to support network construction seem likely. This announcement provides the Department with additional justification to harmonize 700 MHz spectrum with the U.S and apply spectrum allocation mechanisms that will facilitate the development of wireless broadband networks for public safety and remove barriers to spectrum acquisition by organizations providing broadband services in rural and remote locations in Canada.

It is also worth noting that the U.S federal commitment to Wireless Innovation and Infrastructure Initiative includes substantial funding and resources (~\$5B) for diminishing and resolving the lack of broadband citizen access in rural and remote locations (often described as the Digital Divide). The stated goal is to insure connectivity is available to 98 per cent of US proceeds obtained through upcoming spectrum auctions.

Respectfully submitted,

¹ <http://www.whitehouse.gov/the-press-office/2011/02/10/president-obama-details-plan-win-future-through-expanded-wireless-access>