Spectrum Management and Telecommunications

Dear Industry Minister James Moore, Thank you for considering changes to Canada's Antenna Tower Siting Policy and including public consultation. There are a number of concerns that we hope you can iron out in your policy formation which are included in the attached file. Thank you for attending to this extremely important matter that effects the health of all Canadians.

Facilitated by Canadians for Safe Technology
We request the inclusion of non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc...) installations be included in the notification and consultation process.

Rationale for Request: While the update on Feb 5th now requires all new cellular towers regardless of height to fall into the consultation process, we are concerned that telecommunication proponents will choose to install more and more building-mount, rooftop and hydro/utility pole antenna installations closer to homes and schools, as an alternative to working through the consultation process.

We request that changes and or modifications to existing towers/antennas in place that would raise the RF output of the structure by more than 25%, be included in the notification and consultation process.

Rationale for Request: The proposed update from Industry Canada to section 5.4 (Exclusions) below states that existing towers are exempt from the consultation process as long as their height does not increase by more than 25%. While height may be a consideration, the public health concern is the output of the tower/structures. Without inclusion of consultation for an increase in output, Canadians will have no idea of the increased emissions in close proximity to their homes and neighbourhoods. The rationale for consultation of new towers should apply to existing as well.

We request that the distance around a tower that requires notification as per section 5.2 (Public Consultation Process) be increased from 3 times the tower height, to 10 times.

Rationale for Request: Some of the highest exposures and health effects can be experienced up to 500m from the tower, depending on the angle of the antennas. Requiring notification only 3 times the tower height would exclude telecommunication proponents from having to individually notify residents that could be most affected by the installation or modification to existing structures.

Our prime concern is public health. We recognize that it is the mandate of Health Canada to protect vulnerable populations from environmental pollution. Nonetheless, the actions of Industry Canada in this regard could have great impact. Should more antennae in closer proximity be the unintended consequence of the new regulation, the resulting heavy toll to public health could well outweigh the benefits we recognize in this update to CPC-2-0-03.