Director, Spectrum Management Operations, Industry Canada,
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Mar.31,
2014

Thank-you for the opportunity to comment on the changes to CPC-2-0-03.

1. The most serious difficulty that the public and municipalities have with CPC-2-0-03 is the exemption of structures less than 15 m above grade. Please delete this exemption.
   Rationale for Request: Cell companies abuse this exemption. Now there are cell antennas very close to schools, which is prohibited by the School Board, but the School Board hadn’t received notification. People’s homes are being directly affected without notification.

2. Similarly, antennas on light poles, etc. (less than 15 m above grade) should also require public notification. They directly affect the neighbours and are serious health concerns.

3. Please also include non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc...) 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.

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

5. Please increase the distance around a tower that requires notification as per section 5.2 (Public Consultation Process) 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.

My prime concern is public health. I 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.

Thank-you for your kind attention to this very serious matter.

Yours truly,

Michael Meszaros, M.Eng., P.Eng.