Dear Minister Moore and Director, Spectrum Management

I welcome the opportunity to offer comments about what has become an issue of major concern to most Canadian communities and to the citizens of each province.

While Industry Canada was instructed by former Ind. Can. Minister Allan Rock to amend policies to address more of the local concerns, CPC-2.0-03 did just the opposite. It allowed the telecommunications companies more latitude under the guise of the public not being concerned about health, only aesthetics.

I request the following changes to the current policy because are concerned about health effects from RF radiation. Where I use the terms “antennae” or “transmitters”, I mean any devices which use frequencies licensed by Industry Canada, regardless of power or purpose.

1) Notification and consultation on all antenna installations, whether on existing structures or on new towers. Currently excluded:

“Non-Tower Structures: antennas on buildings, water towers, lamp posts, etc. may be installed provided that the height of the structure is not increased by more than 25%”

The justification for exempting antennae being put on existing structures that was given to me by Jim Laursen, Industry Can. BC, is that the public isn’t concerned about the transmitters, only the appearance of the towers. I and many Canadians are very concerned about the health effects from cellular and radio transmitters and believe that we have the right to know where they are being placed in our neighbourhoods.

2) Mandatory notification of residents within a minimum of 2 city blocks of all new antennae sitings.

The microwave radiation has been shown to effect people living up to 500 meters away. People living within that distance have a right to be informed about possible sitings of antennae, whether on a new tower or on an existing structure.

3) Random, independent monitoring of RF emissions, with no prior notification to the telecommunications companies, to determine that the exposure levels are not in excess of allowable limits.

Jim Laursen of Industry Canada informed me that the telecommunication companies are being allowed to do their own monitoring and testing. As a result, the levels of RF in some areas are being allowed to exceed Safety Code 6. Tests were done in Toronto which showed that SC 6 was exceeded
by several times the allowed limit within many areas of the cities, and there is no reason to believe this isn’t happening elsewhere. Antenna farms are being encouraged, which means the likelihood that SC 6 limits will be exceeded are high and increasing.

4) Antennae not be placed within 500 meters of schools or day care centres.

Many independent scientific reports have shown that children are much for vulnerable to the effects of microwave radiation than adults. Many studies have shown that microwave radiation is especially dangerous within 500 meters from an antenna. Our most precious citizens must be protected.

5) Siting considerations, distance requirements, etc apply to new developments.

Cell companies should be made to respect distance restrictions when putting new towers or installing antenna near areas zoned for new homes and/or schools. Without this, companies could and will put towers up close to where new homes will be built, in essence ignoring the intent of the policies.

6) Signage for all transmitters

All licensed transmitters, regardless of where they are sited, should have a sign indicating their presence. Right now transmitters are being disguised in cornices, McDonald’s signs, Star Buck awnings, on roofs of apartment buildings where roofers, carpenters, etc. work or residents sunbathe. They are hidden for “aesthetic reasons”, resulting in people being near fully functioning cellular transmitters without their knowledge.

7) There should be no exclusion from discussion of increase in height of 25% or less.

Consultation and notification for increases in height should be required. This increase is being done for one reason – to accommodate more transmitters. The public deserves to know and to have input about the creation of antenna farms which increase the level of exposure to RF in the area.

8) Under the amended policy is this statement with regard to notification of all new antenna systems.

*New Antenna Systems*: where the height is less than 15 metres above ground level. **This exclusion does not apply to antenna systems to be used by broadcasting undertakings or telecommunications carriers;**
This exception is a dangerous one, weakening the intent of allowing the municipality more input into towers being put into their neighbourhood. The majority of new systems being installed on these short “towers” are telecommunication transmitters. If the amended policy is intended to truly allow input, and to show that Industry Canada is interested in establishing more trust, this must be changed. All antenna systems, regardless of height or purpose, so long as they are intended to hold devices emitting frequencies licensed by Industry Canada, should require notification to and consultation with local residents and government.

I hope that my concerns and the concerns of others that are presented will be taken seriously. The Canadian public is becoming more educated about the health problems associated with prolonged exposure to even low levels of microwave radiation. I realize fully that Health Canada establishes the exposure limits, but Industry Canada establishes the policies that allow transmitters to be put in our communities. It is imperative that we respect our mutual concerns.

Your sincerely,
Sharon Noble
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