TELUS COMMUNICATIONS COMPANY

COMMENTS TO PROPOSED AMENDMENTS TO
INDUSTRY CANADA’S ANTENNA TOWER SITING
PROCEDURES

GAZETTE NOTICE DGSO-001-14 PUBLISHED ON MARCH 1, 2014

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Introduction

1. These Comments are filed by TELUS Communications Company (“TELUS”) in response to Industry Canada’s Proposed Amendments to Antenna Tower Siting Procedures (the “Consultation Document”)\(^1\) In the Consultation Document, Industry Canada has proposed amendments in relation to specific updates to the procedures for the siting of antenna systems in order “to improve transparency and address concerns that local residents and municipalities have expressed about antenna tower siting.”\(^2\) These changes would amend the tower siting procedures set out in Radiocommunication and Broadcasting Antenna Systems, Client Procedures Circular CPC-2-0-03, Issue 4, January 1, 2008 (the “CPC”).

2. TELUS thanks Industry Canada for the opportunity to provide comments on these amendments. Antenna tower siting is a key issue in Canada today. Demand of mobile wireless services in Canada is growing rapidly, as Canadians desire for superfast Internet connectivity wherever they are. As a result, wireless service providers (“WSPs”) must deploy network infrastructure to expand their networks, shore up existing coverage gaps and increase broadband network capacity to meet consumer demand.

3. Unfortunately, deployment of wireless infrastructure is not without its critics. Despite the public’s desire for faster networks available virtually everywhere, WSPs sometimes face local opposition when attempting to build new wireless antenna infrastructure from local citizens and municipalities. In many cases, people or local governments are unaware that siting of antenna systems is a matter of federal jurisdiction, and that it is Industry Canada that ultimately approves where antenna systems may be located.

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\(^1\) Gazette Notice DGSO-001-14, February 2014, publication date in Canada Gazette: March 1, 2014.
\(^2\) Consultation Document, para. 1.
4. TELUS appreciates that the Consultation Document acknowledges the Federal Government’s exclusive jurisdiction of tower siting and that any amendments to such procedures are reflective of this fact. In particular, Industry Canada’s proposed rules are generally consistent with a system of rules that take into account that it is the government body bears the ultimate responsibility to make decisions about antenna siting, but in a process that allows for relevant and reasonable concerns of municipalities and communities to be heard. Of note, in section 2 of the Consultation Document under “Mandate,” Industry Canada states the following.

Under the Radiocommunication Act, the Minister may, taking into account all matters that the Minister considers relevant for ensuring the orderly development and efficient operation of radiocommunication in Canada, approve each site where antenna systems, including antenna towers, may be located. [emphasis added]

5. As such, Industry Canada’s tower siting framework recognizes both the fact that the mobile phone industry has experienced significant growth, driven by the public’s demand for such services, and that the co-operation between carriers and local governing authorities is a critical factor in realizing this growth as it relates to antenna siting procedures and the implementation of new technologies. Any proposals for amendments to tower siting procedures must not unfairly impede a telecommunications carrier’s ability to deploy such facilities nor should it impose onerous conditions or administrative burdens that may slow down the implementation of new technologies which the public demands. Of course, the framework must also allow for a reasonable opportunity for the local community to voice its views on possible tower sites, and set out a comprehensive framework as to how final decisions as to whether a proposed tower site should move forward.

6. With that in mind, TELUS provides its comments to each of the proposals raised by Industry Canada in the Consultation Document.

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3 Consultation Document, para. 2 and 3.
4 Consultation Document, para. 2.
5.1: Industry Canada is seeking comments on the proposed update to Section 1.2 of the CPC-2-0-03 as follows (new text is in bold):

The requirements of this document apply to anyone (referred to in this document as the proponent) who is planning to install or modify an antenna system, regardless of the type. This includes telecommunications carriers, businesses, governments, Crown agencies and the public. Anyone who proposes, uses or owns an antenna system must follow these procedures. The requirements also apply to those who install towers or antenna systems on behalf of others or for leasing purposes (“third party tower owners”). As well, parts of this process contain obligations that apply to existing antenna system owners.

7. Industry Canada is proposing an update to the wording of Section 1.2 of the CPC in order to clarify that the requirements of this document will now apply to anyone within the defined group of operators who are planning to install or modify an antenna system, regardless of the type. This group of operators includes telecommunications carriers, businesses, governments, Crown agencies and the public. The requirements also apply to those “third party tower owners” who install towers or antenna systems on behalf of others or for leasing purposes.

8. TELUS supports this proposal and clarification as it would bring all operators and entities as described above, including third-party tower owners, onto an equal footing in relation to following antenna siting procedures. It is clear that the Radiocommunication Act (the “Act”) applies to all of these entities if they are proponents who are subject to a radio authorization or wish to build on behalf of or lease antenna space to an authorized user. The amendments suggested in the Consultation Document reflect this fact, meaning that the CPC would have symmetrical application across all antenna system proponents. Furthermore, this
proposal removes any ambiguity and confusion with respect to the application of the CPC. In short, it applies to any proponent, irrespective of type of entity.

9. On a related point, TELUS notes that there are antenna tower and site sharing responsibilities\(^5\) that should apply to all tower owners. The problem is that these tower sharing obligations are set out by way of conditions of radiocommunication spectrum licences. As such, there is some question as to whether tower owners who do not hold spectrum licences would be obliged to follow the tower sharing rules. TELUS asks that, as part of a separate consultation, Industry Canada determine the regulatory mechanism to ensure that antenna tower and site sharing responsibilities are applied symmetrically across all entities.

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\(^5\) The antenna tower and site sharing rules are noted in *Conditions of Licence for Mandatory Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Sharing Arrangements*, CPC-2-0-17, Issue 2, March 2013.
Section 5.2 – Industry Canada’s Default Public Consultation Process

5.2: Industry Canada is seeking comments on the proposed update to Section 4.2 of the CPC-2-0-03 as follows (new text is in bold):

Public Notification

1. Proponents must ensure that the local public, the land-use authority and Industry Canada are notified of the proposed antenna system. As a minimum, proponents must provide a notification package (see Appendix 2) to the local public (including nearby residences, community gathering areas, public institutions, schools, etc.), neighbouring land-use authorities, businesses, and property owners, etc. located within a radius of three times the tower height, measured from the tower base or the outside perimeter of the supporting structure, whichever is greater. For the purpose of this requirement, the outside perimeter begins at the furthest point of the supporting mechanism, be it the outermost guy line, building edge, face of the self-supporting tower, etc.

Public notification of an upcoming consultation must be clearly marked, making reference to the proposed antenna system, so that it is not misinterpreted as junk mail. The notice must be sent by regular mail or be hand delivered. The face of the envelope must clearly indicate that the recipient is within the prescribed notification radius of the proposed antenna system.

2. It is the proponent’s responsibility to ensure that the notification provides at least 30 days for written public comment.

3. In addition to the minimum notification distance noted above, in areas of seasonal residence, the proponent, in consultation with the land-use authority, is responsible for determining the best manner to notify such residents to ensure their engagement.

4. In addition to the public notification requirements noted above, proponents of antenna systems that are proposed to be 30 metres or more in height must place a notice in a local community newspaper circulating in the proposed area. Height is measured from the lowest ground level at the base, including foundation, to the tallest point of the antenna system. Any attempt to artificially reduce the height (addition of soil, aggregate, etc.) is unacceptable.

10. Industry Canada is proposing that public notifications of upcoming consultations pertaining to proposed antenna systems are clearly marked in a manner that references the proposed antenna system so as to prevent its misinterpretation as junk mail. Furthermore, it is proposed that such notices must be sent by regular mail or be hand delivered with the face of the envelope clearly identifying that the
recipient is within the prescribed notification radius of the proposed antenna system.

11. TELUS supports Industry Canada’s proposal with respect to clear messaging to identify public notifications to prevent these notifications from being viewed as junk mail. TELUS already attempts to ensure that its notifications are adequately identified. TELUS does not believe that the suggested amendments impose onerous conditions on telecommunications carriers.

12. Industry Canada further proposes new language to clarify how height of antenna systems is measured, in relation to support structures. This language is to ensure that support structure height is measured correctly and that local community newspaper notices are issued accordingly, because such notices are required for support structures that are greater than 30 metres in height.

13. TELUS agrees that this height measurement framework is a reasonable guideline and should be applied consistently across all proponents involved in support structure placement. However, based on the current CPC, TELUS asks that the proposed language be changed to make clear that the structure being measured is the “antenna-support structure,” and not the antenna system.

14. Of note, Industry Canada is proposing to make amendments to paragraph 4 (Public Notification) of section 4.2 of the CPC by changing the wording from “antenna-supporting structures” to “antenna systems” in relation to the 30 metre height requirement and local newspaper notifications. TELUS notes that this proposed change was not bolded in the Consultation Document, but it amounts to a substantive change that requires discussion.

15. The CPC currently reads

In addition to the public notification requirements noted above, proponents of antenna-supporting structures that are proposed to be
30 metres or more in height must place a notice in a local community newspaper circulating in the proposed area. [emphasis added]⁶

16. The Consultation Document proposes the following.

In addition to the public notification requirements noted above, proponents of antenna systems that are proposed to be 30 metres or more in height must place a notice in a local community newspaper circulating in the proposed area. [emphasis added]⁷

17. The distinction between “antenna systems” and “antenna supporting structures” is important and should not be confused. In the introductory section of the current CPC, language is included that is akin to a definition as it relates to antenna systems. The definition reads as follows: “In order for radiocommunication and broadcasting services to work, antenna systems including masts, towers, and other supporting structures are required. [emphasis added]”⁸ As a result, the support structure is a component of an antenna system, which means that its measurement is different than the measurement of an antenna system as a whole.

18. The difference between antenna system and its support structure is consistent with the Act. A plain reading of section 5(1)(f) of the Act clearly illustrates that “antenna systems” are mentioned for the purposes of defining that which constitutes a site subject to the Minister’s approval. Furthermore, section 5(1)(f) then goes on to talk about the Minister’s approval of “all masts, towers and other antenna-supporting structures” as a separate and distinct matter.

19. As such, the CPC at present takes the delineation of an antenna system and an antenna supporting structure, and makes clear that for the purposes of the 30 metre height measurement, it is the antenna supporting structure that is relevant. As a result, the Consultation Document has proposed a significant change in what is to be measured.

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⁶ Consultation Document, p.5.
⁷ Consultation Document, section 5.2.
⁸ CPC, section 1, p.1.
20. TELUS does not agree with the change as proposed. In TELUS’ view, Industry Canada should have bolded the change in the Consultation Document and should have provided its views as to why the change is warranted. It is impossible for TELUS to provide its support on this proposal given that no rationale has been offered as to why the change is necessary. As a result, TELUS asks that the language revert to the current CPC that reads “…proponents of antenna-supporting structures that are proposed to be 30 metres or more in height…” [emphasis added]”

Section 5.3 – Post Consultation Construction Time Limit

5.3: Industry Canada is seeking comments on the proposed new Section 4.4 to be added to the CPC-2-0-03 as follows (new section is in bold):

Whether the proponent followed a land-use authority’s process or Industry Canada’s default public consultation process, construction of an antenna system must be completed within three years of conclusion of consultation. After three years, previous consultations will no longer be deemed to be valid.

21. Industry Canada is proposing that construction of an antenna system must be completed within three years of conclusion of consultation, otherwise previous consultations will no longer be deemed to be valid.

22. TELUS, in principle, supports Industry Canada’s proposed new section 4.4 because the purpose is to make clear that proponents complete construction in a reasonable timeframe following obtaining approval to go forward with the antenna structure. However, TELUS recommends the following wording change to ensure its realistic application.

23. TELUS recommends that the words “construction of an antenna system must be completed within three years of conclusion of consultation” be replaced with the words “construction of an antenna system must be completed within three years after concurrence or conclusion of an impasse.”
24. This replacement wording will more effectively address the operational and negotiation realities involved in the process of constructing antenna systems. Resolution of an impasse can take anywhere from 6 months and upwards, particularly when negotiations between the parties are ongoing or if the final decision resides with the Minister of Industry. Furthermore, a three-year timeline for the construction of an antenna system, from the point of concurrence or conclusion of an impasse, provides a clear timeline for construction and removes any risk for operators as it relates to any potential impasses or revocations after the conclusion of a consultation.

Section 5.4 - Exclusions

5.4: Industry Canada is seeking comments on the proposed update to Section 6.0 of the CPC-2-0-03 as follows (new text is in bold):

All proponents must consult the land-use authority and the public unless a proposal is specifically excluded. Individual circumstances vary with each antenna system installation and modification, and the exclusion criteria below should be applied in consideration of local circumstances. Consequently, it may be prudent for the proponent to consult even though the proposal meets an exclusion noted below. Therefore, when applying the criteria for exclusion, proponents should consider such things as:

- the antenna system's physical dimensions, including the antenna, mast, and tower, compared to the local surroundings;
- the location of the proposed antenna system on the property and its proximity to neighbouring residents;
- the likelihood of an area being a community-sensitive location; and
- Transport Canada’s marking and lighting requirements for the proposed structure.

The following proposals are excluded from land-use authority and public consultation requirements, but must still satisfy the General Requirements outlined in Section 7:

- **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;

**Existing Towers**: modifications may be made, or the tower may be replaced, to facilitate sharing or the addition of antennas, provided that the total height increase is no greater than 25% of the height of the initial antenna system installation. No increase in height may occur within one year of completion of the initial construction;
• **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%; **and**

• **Temporary Antenna Systems**: used for special events or emergency operations and must be removed three months after the start of the emergency or special event.

No consultation is required prior to performing maintenance on an existing antenna system.

Proponents who are not certain if their proposals are excluded, or whether consultation may still be prudent, are advised to contact the land-use authority and/or Industry Canada for guidance.

Height is measured from the lowest ground level at the base, including foundation, to the tallest point of the antenna system. Any attempt to artificially reduce the height (addition of soil, aggregate, etc.) will not be taken into account in the measurement.

25. Industry Canada is proposing updates to current exclusions to the antenna tower siting procedures in the current CPC in an effort to “allow local residents and municipalities to be informed about new commercial towers in their communities.”

26. TELUS will comment on each of the proposed updates above at it relates to new wording to Section 6.0 of the CPC-2-0-03 respectively.

27. First, TELUS asks for a clarification on the phrase “Likelihood of an area being a community-sensitive location” that is contained in the current CPC and is proposed to be maintained based on the Consultation Document. Such a clarification is important to understand the implications of this language with respect to the requirements for consultation with both the public and land-use authority. The phrase “community-sensitive location” is not defined in the

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Consultation Document or in the existing CPC, leading to potential confusion and dispute as to what a community sensitive location entails.

28. As a result, TELUS asks that community-sensitive location be strictly defined based on limited parameters. First, community sensitive locations should arise only by virtue of potential aesthetic factors, taking into account the current location and the relevant attributes of the location. TELUS also requests that Industry Canada make clear local residents claiming health and safety concerns of antenna systems are not valid bases to find that an area is a community-sensitive location.

29. In that regard, TELUS proposes that Industry Canada make specific reference in the revised CPC to the fact that all tower proponents are already required to follow Health Canada’s Safety Code 6 guidelines as a condition of their licences when placing antenna systems. TELUS asks that the CPC be revised to make clear that compliance with the Safety Code 6 guidelines is sufficient to satisfy any health and safety concerns.

30. TELUS does not support the “New Antenna Systems” proposal, whereby telecommunications carriers and broadcasting undertakings would no longer be excluded from land-use authority and public consultation requirements for “New Antenna Systems” less than 15 metres in height. TELUS’ position is based on the fact that the current exclusion ensures that proponents will consider antenna systems across a range of heights, with a tower built no higher than necessary. The fact that new towers less than 15 metres in height are presently excluded from any consultation process means that proponents will attempt to build shorter towers, which have smaller effects on aesthetic concerns in a local area, where feasible.

31. Therefore, TELUS is of the opinion that the removal of this exclusion for telecommunications carriers and broadcasting undertakings offers no incentive to build towers of less than 15 metres in height and is counterproductive to the aims
and objectives of antenna tower siting procedures. Furthermore, this new measure would increase the likelihood of larger towers being built in municipal areas. This is the simple result if all towers for telecommunications carriers and broadcasting undertakings are subject to consultation, regardless of height.

32. In addition, TELUS has experienced that many municipalities do not wish to be consulted in all cases on shorter towers. The proposal in the Consultation Document would not take into account the fact that removing the exclusion for telecommunications carriers and broadcasting undertakings would increase the administrative burden on all parties.

33. Moreover, it must be noted that technology development provides and allows for shorter towers, and it could in the future have shorter towers that are designed to minimize aesthetic impacts. As a result, the current exclusion incents proponents to develop technologies that minimize community impact on shorter towers. As a result, there is tremendous value in the current exclusion policy in that it respects and aids “in spirit” faster wireless technology development and the subsequent deployment of enhanced wireless technologies that the public demands. As shorter tower deployments increase, this exclusion removal risks impairing the speed at which new technology development can be deployed.

34. In the alternative, TELUS recommends that a notification process remain for the installation of new antenna systems of less than 15 metres in height in residential areas but the exclusion be maintained in industrial and commercial areas. This measure would constitute a balanced approach in ensuring that both the local land use authority and public are notified of such installations, whilst preventing the imposition of administrative burdens and delays on telecommunications carriers and broadcasting undertakings through a full consultation process. Notification of towers less than 15 metres in height is also the approach that is currently in place in the accepted CWTA/FCM tower siting protocol.
35. If this “exclusion removal” proposal is to move forward, TELUS believes that it must be applied on a fair and equitable basis to all other operators and entities as described in Section 5.1. At present, the proposed removal of the exclusion is asymmetrical as the exclusion continues to apply to parties who are not telecommunications carriers or broadcasting undertakings. This means that third-party tower owners would still benefit from the exclusion.

36. In this regard, given that telecommunications carriers are already compelled to share sites and antenna-supporting structures, the exclusion of third party tower owners works to artificially distort the make or buy commercial decisions of the carriers by bestowing an advantage on third party tower owners. As a result, if the exclusion is to be removed, it should be clarified so that it is applied symmetrically so that it is also removed for entities such as third party tower owners.

Section 5.5 - Canadian Environmental Assessment Act, 2012

5.5: Industry Canada is seeking comments on the proposed update to Section 7.4 of the CPC-2-0-03 as follows (new text is in bold):

Industry Canada requires that the installation and modification of antenna systems be done in a manner that complies with appropriate environmental legislation. This includes the Canadian Environmental Assessment Act, CEAA 2012, where the antenna system is incidental to a physical activity or project designated under CEAA 2012, or is located on federal lands.

An antenna system may not proceed where it is incidental to a designated project (as described in the Regulations Designating Physical Activities), or is otherwise expressly designated by the Minister of the Environment without satisfying certain requirements applicable to designated projects. Therefore, a proponent of this type of project must contact Industry Canada for direction on how to proceed.

Any proposed antenna system on federal land may not proceed without a determination of environmental effects by Industry Canada. In order to assist the Department in making such a determination, proponents must submit a project description to Industry Canada, considering and addressing those elements of the environment described in CEAA 2012, as well as any determination of environmental effects that may have been made by the authority responsible for managing the federal land. Industry Canada may also require further information before it can complete its assessment. Industry Canada will inform the proponent of
the results of its determination and may impose conditions related to mitigating any adverse effects after making its determination and/or may need to refer the matter to the Governor-in-Council under CEAA 2012.

Also, notices under Industry Canada’s default public consultation process require written confirmation of the project’s status under CEAA 2012 (e.g., whether it is incidental to a designated project or, if not, whether it is on federal lands).

In addition to CEAA requirements, proponents are responsible to ensure that antenna systems are installed and operated in a manner that respects the local environment and that complies with other statutory requirements, such as those under the Canadian Environmental Protection Act, 1999, the Migratory Birds Convention Act, 1994, and the Species at Risk Act, as applicable.

For projects north of the 60th parallel, environmental assessment requirements may arise from federal statutes other than the aforementioned Acts or from Comprehensive Land Claim Agreements. Industry Canada requires that installation or modification of antennas or antenna-supporting structures be done in accordance with these requirements, as appropriate.

37. Industry Canada is proposing updates requiring that the installation and modification of antenna systems be done in a manner that complies with appropriate environmental legislation. This includes the Canadian Environmental Assessment Act, (“CEAA 2012), where the antenna system is incidental to a physical activity or project designated under CEAA 2012, or is located on federal lands.

38. TELUS notes this requirement and it will continue to act in full accordance with environmental legislation, as prescribed by the CEAA 2012. Furthermore, TELUS recognizes that the CEAA 2012 makes no material change to its current mode of operations and that such legislation will only focus on major proposals with significant risks to the environment. In this regard, TELUS agrees that even fewer assessments are anticipated under the CEAA 2012.
Section 6.0 – Additional Comments

6.0 Industry Canada invites additional comments on any other suggested changes to CPC-2-0-03 that relate to the above updates.

39. TELUS submits the following additional comments in relation to suggested changes to the CPC.

40. It is important to note and clarify that radiocommunication antennae, their supporting structures and siting protocols are under the exclusive federal jurisdiction of the Federal Government. In this regard, any rules that municipalities or other local governments set regarding antenna siting must not infringe upon this federal jurisdiction. More specifically, although the current CPC is clear that Industry Canada is the jurisdictional and decision making body for antenna and support structure siting as it relates to radiocommunication, there is still confusion as to the associated protocols with local land use authorities.

41. Through the land use consultation and authority process, it is becoming more evident that local land use authorities are imposing onerous conditions and requirements such as “zoning” that seek to explicitly prohibit or restrict the placement of towers in certain areas. This type of regulatory scheme infringes on federal jurisdiction and impairs the “vital operations” of a federal undertaking, and should not be permitted.

42. TELUS would recommend that there is clear language in the CPC to clarify the jurisdictional boundaries and a defined process that needs to be followed by proponents and local land use authorities in antenna tower siting procedures. This is wholly consistent with the mandate provisions that Industry Canada has noted at section 2 of the Consultation Document.
Conclusion

43. In conclusion, TELUS lays out its responses and comments to Industry Canada’s proposed amendments to Antenna Tower Siting Procedures as provided below.

5.1: Industry Canada is seeking comments on the proposed update to Section 1.2 of the CPC-2-0-03

- TELUS supports this proposal and clarification as it would bring all operators and entities, including third-party tower owners, onto an equal footing meaning that the CPC has symmetrical application across all antenna system proponents.

5.2: Industry Canada is seeking comments on the proposed update to Section 4.2 of the CPC-2-0-03

- TELUS supports Industry Canada’s proposal with respect to clear messaging to identify public notifications to prevent these notifications from being viewed as junk mail.

- TELUS further agrees with the proposed language clarifying the height measurement framework in terms of how tower height is measured and believes it is a reasonable guideline and is consistent for all proponents involved in support structure placement.

- However, TELUS does not support amendments to paragraph 4 (Public Notification) of section 4.2 of the CPC by changing the wording from "antenna-supporting structures" to "antenna systems" in relation to the 30 metre height requirement and local newspaper notifications. As previously stated, there is a clear distinction between these two words in terms of their meaning and such amendments will lead to interpretation issues as it relates to public notification.

5.3: Industry Canada is seeking comments on the proposed new Section 4.4 to be added to the CPC-2-0-03

- TELUS, in principle, supports Industry Canada’s proposed new section 4.4 but with the following wording change, “construction of an antenna system must be completed within three years of conclusion of consultation” be replaced with the words “construction of an antenna system must be
completed within three years after concurrence or conclusion of an impasse,” to address the operational realities of negotiations.

5.4: Industry Canada is seeking comments on the proposed update to Section 6.0 of the CPC-2-0-03

- TELUS will require clarification on the following wording; “Likelihood of an area being a community-sensitive location” in terms of its meaning to further understand the implications with respect to the requirements for consultation with both the public and land-use authority.

- TELUS does not support the “New Antenna Systems” proposal, whereby telecommunications carriers and broadcasting undertakings would no longer be excluded from land-use authority and public consultation requirements for “New Antenna Systems” less than 15 metres in height.

- The removal of the exclusion is asymmetrical as it does not apply to entities such as third party tower owners, and impairs the ability to deploy new technologies at the pace that the public demands.

- In the alternative, TELUS would support a notification process remain for proposed antenna systems less than 15 metres in height located in residential areas.

5.5: Industry Canada is seeking comments on the proposed update to Section 7.4 of the CPC-2-0-03

- TELUS is in support of the proposed updates with respect to the CEAA, 2012 because it makes no material change to its current mode of operations and will only focus on major proposals with significant risks to the environment. TELUS will continue to act in full accordance with environmental legislation, as prescribed by the CEAA 2012.

44. TELUS respectfully submits these comments as of March 31, 2014.