Sept. 4, 2006

Dr. R. W. McCaughern, Director General
Spectrum Engineering, Industry Canada
300 Slater Street
Ottawa, ON K1A 0C8

Dear Sir:

Re: SMSE-005-06 - Response to Consultation Paper on Public Safety Radio Interoperability Guidelines

Introduction:

The North Shore Amateur Radio Club (NSARC) is pleased to comment on the Consultation Paper.

NSARC represents over 100 Amateur Radio operators in North and West Vancouver, B.C. and is active in providing radio communications during local and provincial disaster exercises and events.

NSARC supports the Amateur Radio Emergency Service (ARES, a division of Radio Amateurs of Canada). In association with RAC, our Provincial Emergency Program, and our local North Shore Emergency Management Office, NSARC trains Amateur Radio operators in emergency communications and message handling procedures using several radio technologies and the frequencies authorized by Industry Canada. In these exercises, we are required to interface with many other public safety agencies, such as the police, fire, ambulance, hospitals, and Social Services.

We support any effort to encourage interoperability between the first responders, but also urge action to enhance communications between all agencies. We are therefore pleased to provide comment on the Consultation Paper.

Section 3:

3.1 Definitions: NSARC agrees with the definitions proposed.

3.2 Classifying radio interoperability: NSARC has no comment.

3.3 Other operating environments: Although the Consultation Paper is mainly concerned with the First Tier public safety responders represented by police, fire and ambulance, it is important to include the many other players involved in emergency response. These supporting responders include:
- Public utilities: hospitals, electric, gas, telephone, transportation agencies
- Communications media: broadcasters, satellite, broadband and cable service providers;
- Provincial, county and city emergency managers;
- And of course: amateur radio operators that are scattered throughout the region.

These groups require inter-communication during disaster situations.
Section 4:

4.1 Levels of Radio Interoperability: Each of the methods described in the Department’s five levels are valid techniques in particular circumstances. No one technique is ideal in all circumstances.

4.2 Other methods of Radio Interoperability: NSARC recommends that this topic be discussed in two parts: Radio Interoperability between First Responders, and Radio Interoperability between a First Responder and a Second or Third Tier Responder. A study of such communications paths should be included in the study of interoperability issues.

Section 5: Radio Interoperability Guidelines

NSARC supports the Department’s initiative to create guidelines as described in Options 1, 2 and 3 of this Section. However, it is important that the agencies be required to develop inter-agency communications, supported by regular training, practices and drills to ensure the procedures will be routinely following during real emergencies.

The procedures should include all responders and related agencies in order to be cohesive. The amateur radio community, represented nationally by Radio Amateurs of Canada, is ready, willing, and able to play an important role in providing radio communications during disasters.

In the USA, the federal legislation such as “The 21st Century Emergency Communications Act of 2006 (HR 5852)” specifies that Amateur Radio shall be included in planning for regional emergency communications.

The North Shore Amateur Radio Club recommends to the Department that RAC, ARES and Canada’s amateur radio operators should be recognized as a significant community resource having the capability to supplement and support public service agencies.

Submitted by:

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