Subject: SMSE-005-06 — Consultation Paper on Public Safety Radio Interoperability Guidelines, dated 2006-06-03

Dear Dr. McCaughern;

Introduction:

The Radio Amateurs of Canada (RAC), representing thousands of Amateur Radio operators in Canada, many of whom are actively involved in providing radio communications during local, national or international disaster events, is pleased to comment on this Consultation Paper.

RAC sponsors the Amateur Radio Emergency Service (ARES), a nation wide community service, and trains Canadian Radio Amateurs in emergency communications and message handling procedures, with a variety of radio technologies including use of all frequencies authorized by Industry Canada, ranging from HF, VHF, UHF and Microwave bands in various modes including voice, data, and video.

Radio Interoperability Definitions

RAC agrees with the “Radio Interoperability” definition and classifications as stated by the department.

RAC agrees with the three “Radio Interoperability Operating Environments”. Amateur Radio does provide communications support for many community planned events such as the Vancouver “Sun Run”, and hones skills by participating in disaster relief practices. Responsible authorities can and do call on ARES to provide backup or supplemental communications for large unplanned events or disaster relief operations. A recent example of Amateur Radio ARES participation in disaster relief was Hurricane Katrina where over 1000 Amateurs Radio Operators provided much needed communications for a number of agencies.

Other operating environments:

The examples provided in the Consultation Paper are the primary public safety responders such as the Police, Fire Departments, and the Ambulance Service commonly known as the Primary or First Tier responders. While this is the focus of the IC paper, the study should recognize the numerous players involved in an emergency situation.

Examples of these second and third tier responders are provincial, county and city emergency managers; public utilities such as the electric, gas, telephone and transportation agencies; the communications media such as broadcasters, satellite, broadband and cable service providers, hospitals and, of course, the Amateur Radio operators who are scattered throughout the region.

In an ideal system, all of the above groups are capable of interoperation in some systematic way. Thus, any study of interoperability between first responders should include paths to include the second and tertiary responders in some way.
Levels of Radio Interoperability

The “Five Levels of Radio Operability” in this section implies a progressive improvement as one passes from the lowest level to the highest. RAC believes this is an erroneous construct in that each of the methods described in the Department’s five levels are valid techniques that may be preferable in certain circumstances.

RAC therefore recommends that the five “Levels” not be represented by a pyramid but simply be referenced as five techniques, perhaps in increasing complexity, refraining from the use of the term “levels”.

Other methods of Radio Interoperability

RAC suggests that this question should be discussed in two parts: (1) Radio Interoperability between First Responders, and (2) Radio Interoperability between a First Responder and a Second or Third Tier Responder. For example, an emergency incident may create an urgent need for Police to contact the Highways Department. A study of such communications paths should be included in the study of interoperability issues.

Radio Interoperability Guidelines

RAC supports the Department’s initiative to create guidelines. However, as interoperability methods are developed and implemented, it is vitally important that the agencies be mandated to develop inter-agency communications by firm policies, supported by regular training, practices and drills, to ensure the procedures will be routinely followed during real emergencies.

To accomplish this a coordinating agency, probably at the Federal level, is required. This agency would, in conjunction with Federal, Provincial, and Municipal agencies responsible for public safety, establish Interoperability guidelines and procedures that fit the operational requirements of these agencies, and would be national in scope. The guidelines and procedures should include the second and third tier responders and related agencies in order to create a cohesive whole. Within these latter groups, the ARES and the Amateur Radio community are present to play an important role in providing radio communications, often in an ad hoc and dynamic environment.

It should be noted that in the USA, the US House of Representatives recently passed “The 21st Century Emergency Communications Act of 2006 (HR 5852)” which specifies that Amateur Radio shall be included in planning for regional emergency communications. As is the case in the USA, Amateur Radio and specifically the RAC Amateur Radio Emergency Service should be recognized by the Department as a community resource having the capability to supplement and support public service agencies, including its ability to provide a wider base of interoperability among agencies. This might include cross training between the ARES and the public agency it serves, allowing ARES members to operate public service communications equipment, on behalf the agency, if required in an emergency.

This could be accomplished by the Department giving specific authority for the ARES to operate “out of band”, using the frequencies of existing public services, to facilitate interoperability and provide both support and back up to those systems during specified emergency situations where the number of existing stations is insufficient to meet immediate demands, or the existing public service communications facilities fail for any reason. There would be no “blanket” authority and it would include written agreement with the particular agency(ies). Such authority would be “specific”, indicating certain strict requisites to be met before these operations could be undertaken.

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*a Similar to but more specific than section 5.7 of SRSP-512*
Radio Amateurs of Canada recommends to the Department that Canada would be well served to include the Radio Amateur Service in emergency communications planning, recognizing it as the community resource that it is.

Submitted by:

RADIO AMATEURS OF CANADA

Per

Original signed by

Earle Smith VE7NM, President
Radio Amateurs of Canada Inc.