November 26, 2012

Via email to: Spectrum.Engineering@ic.gc.ca

Manager, Mobile Systems, Engineering
Planning and Standards Branch
Industry Canada
300 Slater Street
Ottawa, Ontario K1A 0C8

Dear Sir/Madam

Re: Canada Gazette, Part I, August 25, 2012, Notice No. SMSE-007-12 - Consultation on a Policy, Technical and Licensing Framework for Use of the Public Safety Broadband Spectrum in the Bands 758-763 MHz and 788-793 MHz (D Block) and 763-768 MHz and 793-798 MHz (PSBB Block)

Imperial Oil Limited is pleased to make the following Reply Comments in response to the Canada Gazette notice regarding the above-referenced consultation.

1. Imperial Oil Limited recommends, consistent with the comments of Public Safety Canada and other respondents, that Industry Canada provide PSNE licensees the flexibility to allow a wide range of users who are not normally involved in "public safety" but may be part of an emergency/major event plan or are involved in ensuring the safety of the public in a broad sense. The decision in this regard should be made by Regional Service Delivery Entities (RSDEs), who are in the best position to assess local needs and requirements.

2. Local population densities will directly affect the ability of RSDEs to construct and operate the public safety network. The use of public safety broadband for lower priority industrial operations requirements, provides an opportunity to create economic viability in a public safety broadband network.

3. Imperial Oil Limited supports the recommendation of Public Safety Canada that the decision whether or not to lease excess spectrum should be the decision of the RSDEs. In addition, RSDEs should be allowed to enter into partnerships with private operators "which would design, build, operate and maintain the facilities and infrastructure at reduced cost to the public purse in exchange for use of capacity on a secondary basis, when it is not required for public safety purposes". Use for industrial requirements, including mining, forestry and utility operations, can be more easily accommodated than services provided to consumers.

Imperial Oil Limited thanks the Department for this opportunity to provide Reply Comments and input into the consultation process.
Paul Ferguson
Mine Operations Manager

Attachment