Manager, Mobile Systems
Industry Canada
300 Slater Street
Ottawa, Ontario
K1A 0C8

Subject: 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)

Dear Sir or Madame,

Public Safety Canada (PS), on behalf of the 700 MHz Project Management Team, has coordinated a response to the Industry Canada (IC) 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). This joint response reflects the views of the public safety community at large.

As the Officer in Charge of Communications, from York Regional Police, we are dedicated to improving communications interoperability and public safety in Canada. We support the joint response of the 700 MHz PMT, as well as the efforts to secure 20 MHz of dedicated 700 MHz spectrum for public safety broadband. We strongly oppose any potential Industry Canada commercial auction of that portion of spectrum.

The use of broadband technology is crucial to the future of public safety in Canada. Allocating 20 MHz of broadband spectrum directly to public safety is the only way to ensure robust, modern, reliable public safety interoperable networks. First responders must have the right tools to protect and save lives. This includes interoperable communications networks that allow real-time information sharing through high speed video and data. This requires an appropriate, dedicated band of spectrum that can accommodate the everyday needs of police officers, firefighters, and paramedics, as well as provide excess capacity during times of emergency. The available 700 MHz block of spectrum provides this opportunity.

Furthermore, the allocation of D block in Canada for public safety would harmonize with the United
States (U.S.) band plan, which sets aside a total of 20 MHz for public safety in the same bands. In its response to Canada Gazette Notice SMSE-018-10 “Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects Related to Commercial Mobile Spectrum”, most submissions supported the “harmonization of the band with the USA band plan” and recommended that the “Department defer its consideration, decision and licensing of D block spectrum until the situation in the U.S. has been resolved.” Given recent key decisions in the U.S. including the allocation of the D block, we recommend harmonizing the band with the U.S. for a number of reasons. First, the coordination of D block in densely populated areas along the border could prove challenging for Industry Canada (IC) and the Federal Communications Commission if D block is allocated to commercial use in Canada. Second, the manufacturing community, responding to the broadband data needs of public safety responders will almost certainly target the much larger U.S. market and design user equipment and applications optimized to take advantage of 20 MHz. In a 10 MHz Canadian environment, there is the potential to leave some of the best and most proficient of these unavailable to Canadians and increase the cost of lesser applications through failure to take advantage of economy of scale. Third, the response to multi-agency, cross border events may be hampered by the inability to use common applications and restrict traffic to the lowest common denominator.

Stewardship of the dedicated spectrum must reside with the broad public safety community. Priority and reliability are two of the main factors that will affect the future capacity of public safety agencies to operate broadband video and data services on a day-to-day basis and during a major disaster. Responders must have access to bandwidth in a reliable manner during emergencies.

Allocating the spectrum for public safety use could lead to economic benefits and improve sustainable broadband in rural and remote areas. Being harmonized with the U.S. could lead to much wider market opportunities for both hardware and software technologies providers.

York Regional Police appreciates this opportunity to share its views and ensure this one time opportunity for public safety is not lost.

Sincerely,

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