September 18, 2006

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

Dear Dr. McCaughern;

Thank you for the opportunity to offer comment on this issue. My comments are from the perspective of one who worked as a police dispatcher and supervisor for a number of years, with additional experience in emergency management.

While I will attempt to restrict my comments to the issues raised in the paper, it is important to realize that Public Safety Radio Interoperability is only one part of a much larger scenario in delivering service when required. Four key elements must be present in any level of emergency response – Command, Control, Communication, and Coordination.

Command, Control and Coordination are evident in the principles of Incident Command and Unified Command, with Communication being the key that binds these elements together. Professor Peter Anderson of Simon Fraser University’s Telematics Research Lab and Centre for Policy Research on Science and Technology speaks of “Communication and Communications”. Communications being the technology and equipment that is used to facilitate Communication. Communication is the human ability to for one or more people to communicate between themselves, as well as the desire (my emphasis) to communicate with others.

Effective Communication is predicated on three elements:

- Spectrum must be available.
- Equipment must be capable of utilizing the available spectrum.
- When the spectrum and equipment exist, success is solely dependent on the people who choose to communicate.

Radio Interoperability Definitions

I support the definition of radio interoperability as proposed in the consultation paper.

I also support the classifications of multi-jurisdictional and multi-disciplinary interoperability as proposed in this section of the consultation paper, with this comment.
Historically, public safety has primarily been seen as the responsibility of our police, fire/rescue and emergency medical agencies. Events of the past decade such as Firestorm 2003, Hurricane Juan, the Red River Floods, Ontario/Quebec Ice Storm to name a few in this country, as well as 9/11, Hurricane Katrina and the Boxing Day Tsunami on the world stage have demonstrated that even the best response efforts can be overwhelmed and communication(s) is absolutely critical.

When considering Large Unplanned Events and Disaster Relief Operations, it has been demonstrated in virtually every instance that the only consistent and reliable source of communications support has been from the amateur radio community, whether as a result of pre-planning or on a purely ad hoc basis.

Levels of Radio Interoperability

The five levels offered are fine, but using the pyramid to diagram the five levels brings to mind Maslow’s Hierarchy and the need to achieve each particular level before one can move up to the next. In reality, it is entirely possible that even on an agency to agency basis, one or more levels may be operational at the same time, depending on circumstances.

Other methods of Radio Interoperability

I concur with others who have suggested that this be split into two part

1. Radio Interoperability between First Responders, and
2. Radio Interoperability between a First Responder and Secondary or Tertiary Responders.

Part 1 addressing police, fire/rescue and emergency medical agencies in their day to day activities and Part 2 addressing the larger and unplanned events that come under the heading of Unplanned and Disaster Relief and result in a much larger number of responder agencies and disciplines.

Radio Interoperability Guidelines

I support the initiative to create guidelines. However, as interoperability methods are developed and implemented, it is critically 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. This can be achieved by first creating the legislation and then supporting the concept through financial support in a variety of ways to enable agencies and organizations to carry out these exercises.

While there is a need for some sort of national working group or committee to spearhead the development and implementation of the protocols that emerge from this process, it must be realized that it must represent the entire public safety communications community and not just the historical “big three”.

Submitted by:

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