Greetings Mr. R.W. McCaughern,

Thank you for the opportunity to comment on Public Safety Radio Interoperability Guidelines.

I would like to share my limited experience working with public safety agency related to radio spectrum, directly and indirectly.

At a high level, I would recommend we let Public Safety and Emergency Preparedness Canada (PSEPC), and Societal Security committee (Standard Council of Canada: SCC: CAC/ISO/TC223), to determine both public safety operation (PSEPC) and system interoperability (CAC/ISO/TC223) requirements. Industry Canada will be of great assistance by managing the spectrum and ensure integrity of spectrum availability and a subject matter expert (SME) on spectrum utilization. There are other agencies we should also collaborate with at the right time.

I am currently working with my disaster planning team (the City of Calgary) on PSEPC initiatives to ensure interoperability between water operations for Western Canada, both multi-jurisdictional, and multi-disciplinary. As a committee member of SCC: CAC/ISO/TC223, we are trying to set a standard for societal security for all hazards, such as standards consolidation, and including command, control, cooperation, and collaboration. I see this public safety interoperability spectrum guidelines as timely and we should all work collaboratively.

Collaboration is critical in the spectrum domain to ensure not only efficient use of spectrum assignment but during operation such as to eliminate cross-chattering. Some good suggestions already covered in the guidelines but we eventually need details for practical execution.

Reality is that not all public safety agencies have spectrum SME on staff. Therefore, it is imperative if Industry Canada or other agency can assist by ensuring spectrum service and product provider, including consultants, are qualify to do business with tri-services (police, ems, fire), including other essential services.

SMSE-005-06 guidelines may need to think about a set of spectrum for other emergency stakeholders to communicate with tri-services. I have been told at emergency operation centre in Calgary has about 50 stakeholders, where only three are tri-services. So in a worst case disaster scenarios, how do tri-services expect to communicate with the other 47 stakeholders to manage multiple incidents effectively?

As for radio interoperability operating environment, we need a scheme to manage the spectrum and its infrastructure system such as
maintenance/trouble shooting/configuration, etc. during a prolong unplanned disaster operation events.

There must be a strategic plan in place for life cycle management of these spectrums because tri-services in municipality are usually financially challenge and cannot upgrade service and assets frequently.

We need better definition and clarification on what actually constitute public safety requirements to ensure other essential services and non-essential services do not compromise safety integrity requirements. I am more concern with interfacing between these systems, which may impact interoperability although they may not interoperate. For example, a virus can take out a router which virtually isolate both public safety network and non-public safety network in a single system, although they do not interoperate operationally.

Radio communication is a very important aspect of emergency operation, and we need a holistic integrated approach to ensure optimize and effective use of radio communication system as part of overall public safety system approach.

Thank you again for this and future collaborative opportunity to protect public safety.

Do not hesitate to contact me at (403) 268-2183 for details or clarification.

Regards,
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