



NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL

April 04, 2008

Via electronic mail

The Honorable Robert W. McCaughern
Director General
Spectrum Engineering Branch
Industry Canada
1943B
300 Slater Street
Ottawa, Ontario K1A0C8
Canada

Re: Comment addressing *Proposed Revisions to the Frequency Plan for Public Safety in the 700 MHz Band*, Notice No. SMSE-004-08, Canada Gazette, January 19, 2008, extended March 15, 2009.

Dear Director General McCaughern:

On behalf of the National Public Safety Telecommunication Council (NPSTC), this letter responds to the request for comment addressing *Proposed Revisions to the Frequency Plan for Public Safety in the 700 MHz Band*, Notice No. SMSE-004-08.

NPSTC represents United States' public safety organizations dedicated to improving emergency communications. Our purpose in writing is directed toward maintaining and strengthening the well established relationships between Canadian and US local, state and provincial, and federal law enforcement, fire, emergency medical and other emergency service agencies. Industry Canada's examination of the 700 MHz band is at a pivotal time and its decisions can contribute meaningfully toward improving emergency response. This review also affords an opportunity to coordinate spectrum use more efficiently for agencies in Canada and the United States. NPSTC urges Industry Canada to harmonize as much as possible the policies and technical rules of Canada and the United States relating to the public safety 700 MHz narrowband and broadband structure.

The National Public Safety Telecommunications Council

The National Public Safety Telecommunications Council, based in Littleton, Colorado, is a federation of concerned public safety organizations in the US who are dedicated to improving emergency service communications for public protection and disaster recovery. Our organization has participated throughout the US Federal Communications Commission's (FCC) examination of the 700 MHz band and in other proceedings addressing public safety. The members of the organizations comprising NPSTC and who participate in its deliberations have plenary responsibility for the range of emergency communications networks dedicated to Public Protection and Disaster Recovery.

NPSTC pursues a role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC explores technologies and public policy involving public safety agencies, analyzes the ramifications of particular issues and submits comments to governmental bodies with the objective of furthering public safety communications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective

American Association of State Highway and Transportation Officials | American Radio Relay League | Association of Fish and Wildlife Agencies | Association of Public Safety Communications Officials | Forestry Conservation Communications Association | International Association of Chiefs of Police | International Association of Emergency Managers | International Association of Fire Chiefs | International Municipal Signal Association | National Association of State Chief Information Officers | National Association of State Emergency Medical Services Officials | National Association of State Foresters | National Association of State Technology Directors | National Emergency Number Association | National Sheriffs' Association

public safety telecommunications. Its meeting and deliberations are open to any individual or interest that seeks to participate.

The following 15 organizations participate in NPSTC:

- American Association of State Highway and Transportation Officials
- American Radio Relay League
- Association of Fish and Wildlife Agencies
- Association of Public-Safety Communications Officials-International
- Forestry Conservation Communications Association
- International Association of Chiefs of Police
- International Association of Emergency Managers
- International Association of Fire Chiefs
- International Municipal Signal Association
- National Association of State Chief Information Officers
- National Association of State Emergency Medical Services Officials
- National Association of State Foresters
- National Association of State Technology Directors
- National Emergency Number Association
- National Sheriffs' Association

Several US federal agencies are liaison members of NPSTC. These include the Department of Homeland Security (the Federal Emergency Management Agency, the Office of Emergency Communications, the Office of Interoperability and Compatibility and the SAFECOM Program), Department of Commerce (National Telecommunications and Information Administration), Department of the Interior, and the Department of Justice (National Institute of Justice, CommTech Program). NPSTC has a liaison relationship with the Telecommunications Industry Association. It also has established a relationship with the Canadian Interoperability Technology Interest Group (CITIG), which is an associate member.

Proposed Revisions to the 700 MHz Public Safety Frequency Plan

Notice No. SMSE-004-08 describes changes the US has made to its 700 MHz public safety segment. It notes that the US Federal Communications Commission has altered its frequency plan to accommodate public safety broadband operations. This significant restructuring led to relocating the previously designated narrowband voice channels. As a result of these changes, the Canada and US frequency plans are not aligned. The notice expresses concern if the two nations' 700 MHz public safety segments diverge. It emphasizes an immediate need to deploy narrowband public safety systems and suggests that narrowband operations take priority over broadband operations. The consultation also invites comment on the viability of accommodating wideband operations.

Aligned Canadian and US Public Safety Communications Rules Enhance Emergency Response

Wireless communications capability in the border regions is a matter of extreme importance. The security and economic significance of these areas and the challenges faced is well understood. Improving communication will assist cross border mutual aid relationships and individual agency responsibilities. NPSTC's own work in the border regions has been directed to addressing interference situations, establishing processes that resolve disputes and promoting consistent frequency coordination protocols. Obtaining public safety agencies on both sides of the border access to valuable spectrum is a direct path to better transmission quality and coverage and improved emergency response. The alignment of the 700 MHz band presents this opportunity.

The length of the Canadian/US border and the long history of shared concern and cooperation between the two nation's federal, provincial/state and local agencies should resound within each nation's policies and rules addressing the 700 MHz public safety radio bands. The green field character of the 700 MHz band, that it is not burdened by the competing interests that converge in the other bands, provides enormous opportunity to improve how these crucial services are carried out. Aligned policies and technical rules will allow cross border agencies to communicate directly with each other. It will provide more intense and efficient use of the spectrum and broaden the competitive market for radio equipment. It can ameliorate to a significant degree the combination of factors present in other bands that stifle efforts to improve communications in the border regions. The result will lead directly to more effective delivery of public safety services and the protection of emergency service officers and personnel.

The proposal's priority of providing narrowband channels is well founded. The propagation character of the 700 MHz band offers significant improvement to public safety communications, as well as additional capacity and interoperability with the added benefits of the availability of dual band 700/800 MHz mobiles and portables. Expediting access to these channels will be a meaningful contribution to emergency response. NPSTC urges caution in postponing decisions regarding broadband operations. We think that the broader requirements that can be fulfilled and the increased benefits obtained through advanced services have become emphatic. It is important for public safety to be assisted by the modern technology associated with the private sector. While the funding and investment for public sector initiatives encompass substantial time, decisions made now with regard to narrowband channels should not foreclose future advanced services. The opportunities broadband affords should be preserved.

It is vital to future Canadian broadband operations and to those in the US border regions to ensure that any initial rules and technical standards provide adequate protections allowing broadband and narrowband operations to coexist in adjacent spectrum without interference. Similar consideration must accompany any authorization for wideband operations deemed to be appropriate for Canada's sparsely populated areas. Neither operation should cause harmful interference to the other. Rules, including channel size, should also preserve a wide range of technology choices. While particular broadband authorizations can be addressed at a later time, protection and coexistence criteria should be formulated now. While involving complex and specialized radio technology questions and legitimate debate, failing to do so will create intractable legacy and technical challenges and limit choice fairly rapidly. NPSTC urges Industry Canada to ensure that its rules include such criteria.

Pursuing harmony with US policies and rules, including protecting broadband operations, will strengthen the expanding cross border mutual aid cross border relationships between Canada and US agencies. It will improve interoperability among Canadian agencies and with their counterpart US agencies. Effective emergency response at the border, or at any location, encompasses dispatching the correct resources to an incident, large or small, expeditiously. This fundamental precept of emergency response will be diluted immeasurably if Canada and US narrowband and broadband operations are not in harmony.

There is an additional critical opportunity presented by the 700 MHz not being burdened by a legacy of prior policies, rules and users. NPSTC increased work in the border areas has been in response to the challenges US public safety agencies face to improve their communications systems or to remedy a gap in coverage or transmission quality. An integral element of these efforts is examining the spectrum environment and applying for additional channels. The challenging licensing process in the border regions includes the justified need to coordinate channel use and obtain approval from Canada. In other frequency bands, agencies frequently encounter varying protocols and procedures, misunderstood policies and lengthy processes. The result is that border agencies are often confounded by an inability to deploy needed improvements.

The resolution of this challenge may lie in formal Canada/US discussions that recognize and accommodate both nation's policies and rules and particular circumstances. NPSTC urges Industry Canada to consider the 700 MHz band as a starting point to move to a more effective and efficient frequency and coordination process in the border regions. An improved process will benefit agencies on both sides and provide more insight and understanding to the challenges each, as well as their regulators, face.

Conclusion

NPSTC commends Industry Canada's efforts to improve public safety communications. With the border regions being a critical security area for both nations, where modern communications are imperative, your decisions will reach far. We urge that Canada and US rules and technical standards addressing the 700 MHz public safety band should be harmonized as much as possible. It is important that the rules protect and preserve future broadband operations along the border. Opportunity should also be pursued to improve the frequency coordination and licensing in the border regions.

On behalf of the National Public Safety Telecommunications Council thank you for the opportunity to submit our views.

Respectfully,



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