October 24, 2012

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 Madam,

Please accept this letter as the response to Canada Gazette, Part I, notice reference number SMSE-007-12, titled 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), respectfully submitted by the Canadian Interoperability Technology Interest Group (CITIG).

As you know, CITIG is a not-for-profit Canadian corporation managed in partnership by the Canadian Association of Chiefs of Police (CACP), Emergency Medical Services Chiefs of Canada (EMSCC) and the Canadian Association of Fire Chiefs (CAFC). CITIG has been working diligently to improve Canadian public safety interoperability at home and abroad through collaborative efforts, innovation and leadership.

As mentioned in the response to Gazette Notice No. SMSE-018-10 submitted by the presidents of the CACP, CAFC and EMSCC, our respective associations have been collaborating on a number of fronts — most notably regarding responder interoperability. The Associations also stressed the following three points:

- The associations urge Industry Canada to set aside 20 MHz of contiguous 700 MHz spectrum for public safety for broadband. This spectrum must not be auctioned.
- Ensure that the allocation of 700 MHz Canadian public safety broadband spectrum aligns with the U.S. band plan, including the now confirmed allocation of the D Block to public.
- Governance of the 20 MHz of 700 MHz spectrum for public safety for broadband use must reside with public safety stakeholders.

We continue to maintain this position. We believe that robust state-of-the-art public safety communications are essential to provide the public with the level of service, protection and security it deserves and expects. That is why CITIG has been a key contributor to the Public Safety Canada coordinated response to the Industry Canada on the current consultation. As Chair of CITIG, I want to
affirm that CITIG, our 1,200 associates and the more than 115,000 police officers, firefighters and paramedics in Canada that we represent are dedicated to improving communications interoperability and public safety in Canada. We support the Public Safety Canada joint response, 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.

As I am sure you will agree, ensuring the safety and security of Canadians is a fundamental goal of both our Government and our responder agencies. At the same time, public safety touches every facet of our lives, including the safety of our families and economic growth. A 20 MHz allocation of 700 MHz spectrum will ensure that Canada’s citizens will be able to receive the best possible public safety services, and that Canadian industry has opportunity to be competitive in this important domestic and global market. Responders need the right tools to protect and save lives. Public safety’s voice must be heard.

Thank you very much for your attention, and we look forward to your favourable reply.

Sincerely,

Deputy Chief William (Bill) Moore
Chair
Canadian Interoperability Technology Interest Group (CITIG)
www.citig.ca