



Brent P. Denny
320 Esplanade, Suite 201
Sydney, Nova Scotia B1P7B9
(902) 563-5140

Cape Breton Regional Fire Service

April 18, 2006

Mr. Larry Shaw, Director General
Industry Canada
300 Slator Street
Ottawa, Ontario
K1A 0C8

Re: Canada Gazette, Part I, December 2005, Notice Reference # DGTP-004-05

Proposals and Changes to the Spectrum in Certain Bands Below 1.7 Ghz
Part 6. Multi-use Radio Service (MURS) in the 150 MHz Band

Mr Shaw:

The Cape Breton Regional Fire Service wishes to go on record as being unconditionally opposed to the Industry Canada proposal regarding MURS in the 150 MHz band. It is totally unreasonable for Industry Canada to expect licensed public safety users of assigned frequencies (many of them volunteer fire services) to replace or re-program their radio equipment to accommodate a new spectrum application for unlicensed users with no compensation for their costs. These are the first responders to emergencies across vast tracts of this largely rural nation, and many operate on very small budgets with very limited opportunity to increase their level of tax revenue.

It is our position that if Industry Canada wishes to accommodate the MURS on the stated 150 MHz frequencies then Industry Canada must provide sufficient funding to the affected parties to undertake the necessary radio reprogramming or replacement as required. This must include not only the licensed two-way radio equipment directly impacted, but also the numerous voice pocket pagers that are tuned to receive the same frequencies which are used for volunteer firefighter notification.

It is not appropriate to impose such costs on affected parties which pay a license fee to operate on those assigned frequencies because commercial and recreational users wish to use them. The approach of Industry Canada to reconfigure the spectrum to accommodate new users because of decisions of the United States FCC at the expense of existing licensed users is a dereliction of duty.

In closing The Cape Breton Regional Fire Service is in full support of the Canadian Association of Fire Chief's position paper on this issue.

Thank you for your attention to matter.

Yours truly,


Brent P. Denny
Deputy Chief/ Volunteer Coordinator

Cc; Mark Eking MP, Roger Cuzner MP, CAFC