

**PROTECTIVE SERVICES**

May 1, 2006

Mr. Larry Shaw, Director General  
Telecommunications Policy Branch  
Industry Canada  
300 Slater Street  
Ottawa ON K1A 0C8

Dear Mr. Shaw:

**Subject: Industry Canada Proposal – 150 MHz Bandwidth**

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On April 18, 2006, City of Leduc Fire Services received a communiqué from the Canadian Association of Fire Chiefs (CAFC) advising that Industry Canada was proposing changes to the spectrum in certain bands below 1.7 GHz and specifically the 150MHz bandwidth currently utilized by the majority of fire departments across Canada.

CAFC has provided us with a copy of the April 12, 2006, position paper that was sent to you. Leduc Fire Services fully supports the contents of the CAFC paper as several points raised in the position paper clearly describe how the proposed changes to the bandwidth will affect our department. In particular, we wish to draw your attention to the following points raised by CAFC that cause us particular concern.

1. *"It was Industry Canada that reduced the spread available to the Fire Services from 24 kHz to 12kHz within the 150 MHz bandwidth and encouraged the Fire Services to migrate to that location."*

City of Leduc Fire Services complied with Industry Canada's direction of five years ago. The cost to our department to upgrade our equipment in order to become compliant was \$100,000.00.

2. *"To propose that the five 150 MHz bandwidths be opened up to multi-use radio service (MURS) will create significant hardship to the Fire Services. It is disappointing to read that a rationalization for the Proposal is that 'Canadians are large consumers of electronic devices and radio technologies and want similar radio products as those available in the U.S. market.'"*

It appears that Industry Canada is punishing existing licensees in order to accommodate new technology for non-emergency consumers. It would be more logical to open unused bandwidths to accommodate the new technology rather than forcing the expense of transition onto the existing licensees, especially when the existing licensees provide critical emergency services to their communities.

3. *"When Fire Chiefs stood before their municipal councils over the past three years to argue in favour of re-equipping their radios, they assured these councils that the new radios would be used for many years to come."*

As mentioned previously, City of Leduc Fire Services spent \$100,000 to upgrade its equipment to comply with this previous direction of Industry Canada. The new proposal will render our existing equipment obsolete and the estimated cost to our department and our taxpayers to migrate all equipment to the new bandwidth would be \$250,000 to \$350,000. This is an unnecessary hardship for Leduc Fire



Services after already purchasing and upgrading equipment that would have adequately served our purposes for several years.

4. *"The use of the 150 MHz band is widespread for paging of volunteers as well as operational frequencies for fire departments."*

Opening up the 150 MHz band will not only affect fire departments. In the City of Leduc, Fire Services uses channels 153 and 155; Leduc RCMP, along with our Special Constables in Enforcement Services, uses the 155-159 bandwidths. Leduc Public Services also uses channel 154. Industry Canada's proposal will not only affect Fire Services, but a number of other first response agencies in our community.

5. *"Fire Departments run the risk of having their communications channels jammed by non-public safety users."*

Fire departments that do not have the funds available to upgrade their equipment to meet the proposed change by Industry Canada may be forced to continue utilizing the 150 MHz bandwidth. With public users utilizing this bandwidth, there is the potential for the jamming of communications channels, which will become an extreme liability for the safety of the firefighters, the department, and the community.

6. *"Fire Departments, and especially smaller Departments, in adjacent communities usually have mutual assistance plans that have been well established. The purpose of such plans is to permit two or more Departments to join forces to combat a fire or other emergency that is beyond the capacity of any one Department to control."*

In the Leduc region, all police, fire, and EMS utilize the 150 MHz bandwidth. Leduc Fire Services also has mutual aid agreements with fire departments in the region. Unless all departments are able to upgrade equipment to move out of the 150 MHz bandwidth, the disparity between communications channels will interrupt and interfere with our ability to communicate with our mutual aid partners. Again, this will jeopardize the effectiveness of emergency response and the safety of our firefighters and our residents.

Industry Canada's proposal to open up the 150 MHz bandwidth causes our municipality a number of concerns. We implore Industry Canada to reconsider opening up the five 150 MHz bandwidths to multi-use radio service and to look instead for alternatives that will not jeopardize the operation of our emergency services.

Sincerely,



Rick Sereda  
Director, Protective Services/Fire Chief

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cc: James Rajotte, Member of Parliament  
Mayor Greg Krischke, City of Leduc  
Kevin Robins, CAO, City of Leduc  
Fire Chief Donald Warden, Chair, CAFC Government Relations Committee