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To: Senior Director  
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Via email: [ic.spectrumoperations-operationsduspectre.ic@canada.ca](mailto:ic.spectrumoperations-operationsduspectre.ic@canada.ca)

Subject: **Consultation on Amending CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems – Comments**

1. In accordance with the procedure set out by Innovation, Science and Economic Development Canada (the Department or ISED) in Notice No. DGSO-002-21, *Consultation on Amending CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems*, issued in the Canada Gazette, Part 1 on 20 March 2021, we are providing our Comments on behalf of BCE Inc. on the proposed amendments to the Client Procedure Circular CPC-2-0-03 on Radiocommunication and Broadcasting Antenna Systems.

2. We support the Department's proposed revisions to CPC-2-0-03 to ensure that Canadians are able to participate in public consultation processes in the official language of their choice. We are also supportive of the additional proposals dealing with general updates of the Client Procedures Circular based on new legislative, regulatory and policy developments including updating the name of the Department to ISED.

3. Of the two options outlined by the Department, we support the implementation of Option 2 which would only be applicable in those instances where the proposed antenna system installation or modification would be located in a community (a census subdivision) where the English or French linguistic minority population meets a minimum threshold percentage of 5%.

4. We also agree with the Department's proposal to append to the revised CPC-2-0-03, a list of communities that meet the minimum threshold percentage of 5% based on the most recent Statistics Canada Census data on First Official Language Spoken. We further concur that in the event that a land-use authority's existing process requires bilingual communications with the public, that proponents would follow those requirements.

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5. As a result, we agree with the Department's inclusion of the Option 2 related text in the revised CPC-2-0-03 to deal with the official language requirement.

6. With respect to timing of the introduction of the language requirements, we believe that it would be appropriate to implement the requirements one year after the Department has published the revised CPC-2-0-03. A one-year implementation period is necessary for regulated entities to hire qualified individuals who are fluent in the minority language in question when dealing with consultations in the applicable communities.

7. With respect to the applicability of the language requirement, the requirement should only apply to new proposed sites and not apply retroactively to any consultation(s) that may have been initiated.

8. With respect to the Department's proposal to update the name of the Department to ISED throughout the CPC-2-0-03 document as well as update the references related to the environmental considerations and aeronautical safety responsibilities as outlined in the consultation, we support the proposed amendments.

9. Thank you for the opportunity to provide our input and comments on this consultation.

Yours truly,

A handwritten signature in black ink, appearing to read "M. MacInnis". The signature is fluid and cursive.

**Michael MacInnis**  
Vice President – Regulatory Affairs

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