



Senior Director  
Spectrum Management Operations Branch  
Innovation, Science and Economic Development Canada  
235 Queen St,  
Ottawa, Ontario K1A 0H5

April 15, 2021

**RE: Consultation on Amending CPC 2-0-03 – Radiocommunications and Antenna Systems  
Canada Gazette, Part I, DGSO-002-21, March 2021**

Dear Sir / Madame:

As you are aware, CRINS-SINRC currently processes and reviews applications and oversees public consultations for a number of municipalities across Canada. CRINS-SINRC is the designated representative of our Land Use Authority members and provides the recommendations and concurrence statements on behalf of our members to proponents and ISEDC as part of the consultation on antenna system proposals. These consultations occur within the context of CPC 2-0-03, and related Client Procedure Circulars documents and follow the CRINS-SINRC protocol.

With respect to the proposed amendments, we offer the following:

**Section 6.1 – Proposed implementation of official language requirements in the public consultation process**

With respect to the proposed amendments outlined in Section 6.1 of the consultation document, CRINS-SINRC is supportive of either option proposed by ISEDC. Recognizing that radiocommunications are a federal undertaking and therefore subject to the *Official Languages Act*, and while not a federal agency, CRINS-SINRC currently supports and conducts consultations in both official languages based on the traditional language usage of our individual LUA members. This is dictated currently by the LUA member with the exception of New Brunswick LUAs which are officially bilingual by statute.

With the transition to a substantively online consultation process as of August, 2020, which was accelerated by the COVID-19 pandemic, the additional printing and associated written communications costs of conducting consultations in both official languages are not viewed as unreasonable.

We would suggest however that ISEDC should recognize that some of the materials provided by proponents are typically unilingual and are provided by consultants and 3<sup>rd</sup> parties. For example, items such as surveys and site plans are not typically bilingual and these documents are provided by CRINS-SINRC directly to the public without modification. We would take the position that the responsibility to ensure that source materials are compliant with ISEDC guidelines would fall to the proponents and it would not be CRINS-SINRC nor the LUA, providing the translation.

Proponents which operate on the national stage are capable of producing materials in both official languages, however we would note that smaller operators, typically regional or local entities may not have the resources in-house and this may increase their costs to some degree especially under Option 1.

For consultations conducted within CRINS-SINRC enabled jurisdictions, these costs would be mitigated as CRINS-SINRC produces the majority of public facing communications. With the exception of source materials

noted above – the remainder of items which are produced by CRINS-SINRC in-house are available in both official languages.

In terms of verbal communications, CRINS-SINRC does not currently mandate that public facing staff be bilingual as the wide majority of consultations through CRINS-SINRC members are currently in English. However, CRINS-SINRC takes no issue with adding additional bilingual resources as needed to support ISEDCs guidelines and its members' needs.

If asked to indicate a preference, we believe Option 2 proposed by ISEDC may provide for an easier transition for proponents, however either option is supportable by CRINS-SINRC.

We take no position on the timing proposed by ISEDC to implement either Option, and therefore are supportive of the timeline proposed.

## **6.2 Other Amendments**

CRINS-SINRC supports the proposed changes, and will mirror those changes in its own documentation.

We thank the department for soliciting CRINS-SINRC for its input and for your continued assistance with our consultation process.

Sincerely yours,



Todd White  
Executive Director

cc. CRINS-SINRC Advisory Board.