



FIRE SERVICE ASSOCIATION OF NOVA SCOTIA

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Director, Spectrum Regulatory Best Practises
Innovation, Science and Economic Development Canada
235 Queen Street
Ottawa, ON K1A 0A5

Dear Sir/Madam:

**Canada Gazette, Part I, October 6, 2017, SLPB-066-17
Consultation on the Spectrum Outlook 2018 to 2022**

On behalf of Fire Service Association of Nova Scotia (FSANS), we are responding to the Innovation, Science and Economic Development (ISED) Spectrum Consultation that is currently in progress.

The Fire Service Association provides leadership and representation in the matters of fire and public safety to the fire service, government, private sector and citizens of Nova Scotia. Currently, the FSANS represents close to 300 fire departments throughout the province, and has close to 600 members. A vast majority of these fire services and members reside in rural communities in Nova Scotia, and ultimately rely on services from Wireless Internet Service Providers (WISPs) such as Seaside Wireless Communications, using fixed TD-LTE in the 3.65 GHz band, to provide internet service.

In order to provide optimal fire services to all areas of Nova Scotia, the need for reliable internet services at considerably higher speeds is fundamental. Seaside Wireless works closely with the FSANS on many projects, including delivering free internet service to any fire service within the areas Seaside serves through a Fire Department Initiative they have developed and implemented since 2013. Internet speeds provided by Seaside Wireless have increased from the initial offering of up to 1.5 Mbps to up to 10 Mbps in quite an efficiently short timeframe. The steady improvement in the capability of this service has the potential to be hindered significantly by the proposed policy changes currently being considered by the ISED to diminish the access to spectrum for fixed-wireless WISPs. The Fire Service Association of Nova Scotia thoroughly supports the submission by Seaside Wireless to allow WISPs access to the 3400 - 3700 MHz licensed spectrum.

Companies like Seaside Wireless Communications have heavily invested in extensive fixed wireless infrastructure within our area, reaching vast areas of rural Nova Scotia and providing service to those who would otherwise be deemed unserviceable. Having access to this broader spectrum would assist the various emergency services, as well as businesses and residents, who rely on greater bandwidth and higher speeds to conduct emergency efforts as well as everyday tasks.

The Fire Services Association of Nova Scotia urges ISED to consider our position as you form a decision on spectrum allocation for 2018 to 2022. The decision you make will have a considerable impact on the delivery of essential emergency services, such as those provided by FSANS, and the citizens of Nova Scotia for many years to come.

Sincerely,

Jim Roper, President
Fire Service Association of Nova Scotia