



March 31, 2014

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Re: CWTA Comments, *Canada Gazette*, Part I, March 1 2014, *Consultation on Amendments to Industry Canada's Antenna Tower Siting Procedures (DGSO-001-14)*

1. The Canadian Wireless Telecommunications Association is the recognized authority on wireless issues, developments and trends in Canada. It represents cellular, PCS, messaging, mobile radio, fixed wireless and mobile satellite carriers as well as companies that develop and produce products and services for the industry, including handset and equipment manufacturers, content and application creators and business-to-business service providers. CWTA is pleased to file its comments with respect to the above-noted proceeding.
2. CWTA is keenly aware of the challenges involved in siting wireless infrastructure in a timely manner to address increasing network capacity and coverage demands. It is particularly challenging to meet the rapidly growing wireless demand in residential areas in ways that also respond to and respect local community sensitivities. As the consultation paper notes, while "finding appropriate [antenna] locations has become more difficult and has resulted in growing concerns... the vast majority of antenna installations are constructed in a spirit of cooperation between municipalities, other land-use authorities, local residents and proponents."
3. Beyond the wireless service providers' direct efforts to work with communities when siting new antenna systems, CWTA has worked with Canadian municipalities to establish consistent, common sense siting guidelines that respect local land-use preferences and respond to community concerns. As the consultation paper acknowledges, in February 2013 CWTA and the Federation of Canadian Municipalities (FCM) released our joint Antenna System Siting Protocol Template, the result of more than a year of collaboration between FCM and CWTA.
4. Before and after launching the joint Protocol Template, CWTA also made significant efforts to reach out to Canadian municipalities to discuss antenna siting. Specifically, CWTA organized and hosted a series of Wireless Antenna Siting Forums across the country and participated in panel sessions on antenna siting at the conferences of various associations of municipalities. In total, CWTA engaged municipal leaders and provincial and federal elected officials in Vancouver, Saskatoon, Ottawa, Montreal, Fredericton, Halifax and St. John's.
5. CWTA undertook this outreach initiative and approached FCM to develop joint solutions to antenna siting: to address ongoing concern among municipalities about the increasing number of wireless antennas in their communities; to identify options that allow municipalities to receive more information, and have more input, on the antenna siting process within their region; and to provide more certainty for wireless service providers.

6. CWTA also undertook to augment the existing antenna siting procedures so the government would not have to do so. CWTA prefers industry-led solutions over regulation to address issues facing the wireless sector. The inherent flexibility of industry-based solutions allow them to be updated, augmented or altered as necessary to meet the needs of specific municipalities, and adapt to a rapidly changing industry. Proactive, industry-led solutions can also allow the government to focus its regulatory efforts in other critical areas.
7. Nonetheless, CWTA is pleased that the suggested updates to Industry Canada's Client Procedures Circular CPC-2-0-03 align the regulatory requirements for antenna siting with key elements of the FCM/CWTA Protocol Template. CWTA members have reported a positive improvement in antenna siting over the past 13 months due to the increased notification and community involvement encouraged by the joint protocol template over the past 13 months. FCM has confirmed the positive impact of the joint protocol template as well.
8. CWTA therefore supports Industry Canada's proposed changes to the CPC. Encoding the changes in regulation will further ensure all municipalities benefit from some of the key components of the FCM/CWTA Protocol Template, while the template itself will remain a valuable resource to help municipalities develop detailed, customized antenna siting protocols.
9. CWTA appreciates the opportunity to participate in this consultation.

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