

31 March 2014

To: Director, Spectrum Management and Telecommunications - spectrum.operations.ic.gc.ca  
and Honourable James Moore, Minister of Industry - minister.industry@ic.gc.ca

**Subject: Canada Gazette, Part 1. March 1, 2014. Notice GSO-001-14  
Consultation on Amendments to Industry Canada's Antenna Tower Siting Procedures (CPC-2-0-03)**

**Part 1 of a 2 part submission**

**Extension of today's deadline until after Health Canada finalizes the revised Safety Code 6.**

On February 27th, Industry Canada announced that it "is seeking comments from the public on updates noted in their Consultation on Amendments to Industry Canada's Antenna Siting Procedure, and also welcomes comments on any other suggested changes to CPC-2-0-03 that relate to the above updates". It also states that "Industry Canada may make consequential updates elsewhere in the antenna siting procedures (CPC-2-0-03)" [DGSO-001-14, page 8].

I welcome the opportunity to provide comments and will provide comments specific to DGSO-001-14 in a separate submission to be sent later today.

In this submission I comment on the questionable date for the deadline of these comments, March 31st, 2014. It would be easy to come to the conclusion that this current call for public comments is flawed and a sham.

As stated in the Memorandum of Understanding between Industry Canada [Spectrum Information Technologies and Telecommunications Sector, Department of Industry] and Health Canada [Healthy Environments and Consumer Safety Branch, Department of Health] signed in 2011, under section 1) (4): it is the responsibility of Health Canada (HC) to keep Industry Canada "... informed of new scientific information regarding potential health effects of radiofrequency exposure and of potential amendments to Safety Code 6 and other international guidelines".

Making the reasonable assumption that HC fulfilled this requirement, IC should be fully aware that the proposed Safety Code 6 (2013) [revised SC6 (2009)] is under review. A report reviewing Safety Code 6, contracted to Royal Society of Canada by Health Canada, is to be released on April 1st - tomorrow. Further, the Honourable Minister of Health Canada stated in the House of Commons on March 28th that "Following receipt of the report from the RSC, Health Canada will consult further with Canadians prior to finalizing Safety Code 6" (quote from Hansard Volume 147, number 064).

The closing today of public comments by IC is clearly premature. The IC News Release of February 5th, 2014 states, "Canadians deserve to have a say in how new cell towers locations are identified in their communities. Improvements to IC's ... Policy will ensure that local residents and municipal governments are at the forefront of the tower placement process". To ensure that this is carried out, IC's process for the current public comments to CPC-2-0-03/DGSO-001-14 MUST be extended.

**Question 1 (further questions in Part 2 of this submission):**

**Will Industry Canada extend its deadline for comments to CPC-2-0-03 until AFTER Health Canada finalizes the revised Safety Code 6?**

Sincerely, Margaret Friesen  
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