



July 16, 2026

Geoff Colman
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(Submitted by email - spectrumoperations-operationsdsuspectre@ised-isde.gc.ca)

Subject: DGSO-001-26 - *Consultation on Amendments to the Tower Siting Process and Decision on Roaming, Tower Sharing and Annual Reporting Requirements for Terrestrial Licences*

Dear Geoff Colman,

Please find attached the RABC response to the above noted consultation. The Board created a special working group with broad participation from its members to review the proposed amendments to the Tower Siting Process.

The response to DGSO-001-26 was sent to RABC Sponsor Members for ballot. Of the Board's 20 Sponsor Members, 12 approved the submission (Bell, Canadian Association of Broadcasters, Canadian Association of Broadcast Consultants, Canadian Association of Chiefs of Police, CanWISP, CBC/Radio Canada, Canadian Wireless Alliance, National Defence, Radio Amateurs of Canada, Railway Association of Canada, Rogers and TELUS), and 1 abstained (NAV CANADA).

We appreciate having had the opportunity to provide comments to this important consultation.

Sincerely,

J. David Farnes
General Manager

Attachment

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Response to DGSO-001-26

Q1

ISED is seeking comments on its proposal to remove the requirement of providing paper notification packages and replacing it with an online portal contemplated as set out above.

The RABC members are broadly in favour of ISED's proposal to replace paper notification packages with an online portal. The proposed policy eases the burden on tower proponents proposing to erect antenna systems.

However, tower proponents should continue to have the option to use paper notification packages when appropriate. This can be helpful in some rural and remote communities where access to the Internet may not be as available to certain members of the public. It is recommended that the portal be capable of producing a pdf file version of the notification package, using the information uploaded to the portal.

Moreover, members have raised concerns regarding the portal's discoverability for the general public. Specifically, we seek clarification on how the system will filter information to ensure that notifications are directed only to the relevant, impacted individuals in the notification radius. Open access to all applications on the portal could create an unmanageable amount of information and invite many comments or questions from parties outside of the required notification area.

To help mitigate these discoverability concerns, members note that physical signage could serve as an effective method to direct the public to the online portal, but as mentioned in our response to question 5, other methods should also be possible.

Q2

ISED is seeking comments as to whether 30 days following notification is an appropriate timeframe for the public to communicate any reasonable and relevant concerns to a proponent regarding a proposed tower.

The RABC members support ISED's proposal to establish a 30-day timeframe following notification for the public to communicate reasonable and relevant concerns to a tower proponent.

To eliminate ambiguity for both proponents and the public, members propose that this requirement explicitly specify "30 calendar days".

Q3

ISED is seeking comments on the above list and any additional questions proponents should be required to answer in the online portal.

RABC proposes that:

Question a. should be reworded as follows; “What is the purpose of the tower and what telecommunications or other radio services will it provide?”

Question b. The RABC has no comment regarding question b.

Question c. The RABC suggests : “Question c. What alternate sites were considered?” If concerns are raised regarding potential sites during the initial LUA consultation, proponents will explain why alternate sites were not selected.

Questions d. and e. should be combined into a standard statement that the proposed tower use will comply with regulations to meet safety requirements, including aeronautical safety, radio frequency exposure limits, restricted access to the general public, and statutory requirements under the [Impact Assessment Act](#).

The requirement to answer Question f. should be deleted as it is in a proponent’s best interest to choose locations that minimize impact on the local surroundings while still fulfilling network coverage requirements. While there is some variation in tower design, a tower is still a tower and they will be visible within the local environment.

Q4

ISED is seeking comments on its proposal to require proponents to address only the concerns of those inhabiting within a radius of three times the height of the proposed tower.

The RABC respectfully abstains from commenting.

Q5

ISED is seeking comments on its proposal to require proponents to include physical signage on the site of the proposed antenna tower and the information that should be contained on the signage.

The RABC members appreciate ISED's objective to ensure the public is well-informed of proposed antenna systems. However, we submit that a mandatory physical signage requirement poses significant practical challenges and is not the most effective communication tool for every project. Instead, we strongly recommend that ISED provide a flexible approach, allowing proponents to fulfill notification requirements by choosing one or more of the following methods: physical signage, direct mail (letters or postcards), local community newspapers, municipal websites, community Facebook pages, or other LUA-recommended channels.

Physical signage is often impractical as it can conflict with municipal bylaws, is susceptible to vandalism, and poses logistical challenges for installation and maintenance, particularly during the winter. For towers located in remote areas, signage is unlikely to reach the public effectively, and accessing these sites to scan a QR code could pose safety risks. Also, it is impractical, overly stringent, logistically burdensome and cost inefficient to remove signage one week after tower approval. RABC suggests that proponents should be required to remove signage as soon as practical.

In some cases, the proponent may not have entered into an agreement yet with the landowner to permit access to the site or erect signage, making compliance with the signage requirement impossible. Similarly, some remote sites may not be accessible in winter.

Regardless of the communication medium selected, RABC members agree that proponents must provide the requisite information to direct the public to the online portal. If signage is posted, proponents should not be required to post company names and phone numbers or employee names and phone numbers as they can lead to vandalism and/or harassment. The sign could merely state that an application to erect an antenna tower has been made for this location and all relevant information is available on the ISED portal.

To conclude our response to question 5, RABC recommends the only requirement should be that the proponent has used available and appropriate options to ensure that the LUA and residents within a radius of three times the tower height have been notified and directed to the ISED portal.

Q6

ISED is seeking comments on its proposal to remove the requirement for tower proponents to place a notification in the local community newspaper for tower proposals.

The members of the RABC support ISED's proposal to eliminate the mandatory requirement for tower proponents to place notifications in local community newspapers. However, consistent with our recommendations regarding Question 5, the RABC submits that publishing in local newspapers should be retained as an acceptable, optional method.

Q7

ISED is seeking comments on what concerns it should consider valid for an LUA to raise in support of its nonconcurrency and which of those concerns proponents can be reasonably expected to accommodate.

LUA concerns regarding safety requirements, including aeronautical safety, radio frequency exposure limits, restricted access to the general public, and statutory requirements under the Impact Assessment Act should not be considered valid because they are governed by existing regulations. Valid LUA concerns should focus on whether the proponent has followed the notification process and whether reasonable efforts have been made to address issues raised. For these reasons, the RABC recommends that ISED delete proposed reason c. in paragraph 40 as it provides LUAs with the ability to issue a non-concurrence for safety reasons or as worded, “safety requirements not followed”. As noted, safety requirements are already addressed at a federal level.

In addition, proponents may be subject to other regulatory and legislative frameworks such as provincial utility legislation. RABC encourages ISED to provide greater clarity regarding the interaction between federal authority and local consultation processes to minimize duplication of effort and conflicting requirements while preserving meaningful local input.

Q8

ISED is seeking comments on its proposal to establish a 45-calendar-day timeframe for LUA concurrence.

The RABC supports ISED’s initiative to establish a strict, default timeframe for LUA concurrence, as it aligns with the shared objective of reducing administrative delays and accelerating wireless infrastructure deployment. However, the RABC respectfully submits that the proposed 45-calendar-day timeframe is unnecessarily long and should be reduced to 30 calendar days.

In practice, tower proponents typically engage in extensive preliminary communications with the applicable LUA long before the formal public notification process commences or applications are submitted to ISED. Because the LUA is already familiar with the proposal by the time formal concurrence is requested, a 30-calendar-day window provides ample time to complete the administrative step of issuing concurrence. Furthermore, our members note that the tower siting process routinely stretches over many months. Adopting a strict 30-calendar-day timeframe will more effectively prevent the stalling of projects at the municipal level while appropriately balancing the LUA’s important role in the siting process.

Q9

ISED is seeking comments on its proposal to allow telecommunications operators, third-party tower owners and broadcasting undertakings to forego LUA consultation and public notification for new towers that measure less than 15 metres in height.

RABC members are in favour of allowing telecommunications operators, third-party tower owners and broadcasting undertakings to forego LUA and consultation and public notification for new towers that measure less than 15 metres in height, subject to our response to question 10 below. Our members agree that standardizing this exclusion is a positive step for all industry stakeholders and will facilitate more efficient infrastructure deployment. Many Radio Amateurs erecting modest antenna systems have found that the current exemption has minimised conflicts with neighbours and LUAs.

Q10

ISED is seeking comments on whether 15 metres in height is the appropriate threshold for the exclusion, or whether another maximum height would be more appropriate.

The RABC members recommend that ISED increase the height threshold for the consultation exclusion from 15 metres to 25 metres.

Several Canadian municipalities allow greater heights for residential use antenna systems with little or no consultation. Winnipeg allows a height of 20 metres without consultation. Ottawa allows a height of 18 or 29 metres without consultation, depending on the size of the lot on which an antenna system is installed. Calgary allows a height of 18.75 metres with a very minimal consultation.

While the RABC supports ISED's objective to streamline the deployment of wireless infrastructure, the proposed 15-metre limit excludes the most common, cost-effective infrastructure used to serve small, rural, and remote communities. Specifically, broadcasters and telecommunications operators frequently rely on standard 60-foot (18.3-metre) wooden poles or short steel towers for these deployments. Increasing the threshold to 25 metres would significantly reduce the regulatory burden for these low-impact projects, accelerating connectivity and allowing more projects to come to fruition.

Mobile Operators report that current common simple deployments are now between 20 and 25 metres in height, given the size of active antennas being deployed. These installations can still be accommodated on monopoles, which are visually comparable to 15-metre towers, while

offering important operational advantages. Most cellular deployments are multiband and require multiple antennas (each antenna array being 2-3 metres in height). In addition, colocation arrangements may involve multiple operators sharing a tower, each with its own antennas. Adequate vertical separation is needed to minimize interference, and a 15-metre tower often does not provide sufficient space for two or three antenna arrays. Allowing exclusion for towers of up to 25 metres would therefore support greater colocation, reduce the need for additional towers, and make more efficient use of available sites. Towers in the 20- to 25-metre range also generally extend above the mature tree canopy¹. This improves coverage, particularly for mid-band 5G deployments which are more susceptible to signal attenuation from foliage.

Railways rely on wireless technology for many aspects of their operations, including voice dispatching to trains, data for remote switch control, data to report back track occupancy and data to report back safety monitoring from trackside inspection stations. A typical passing siding may require 3-4 electronic equipment locations, each needing some sort of antenna structure. Trackside locations generally communicate wirelessly to larger, well situated, radio sites with 50 metres or taller towers. The trackside locations are chosen for their operational benefit to the railway, not for a good radio path. Railways sometimes limit their trackside tower height to fall within the “15-metre exclusion” limit due to the time and cost to go through the tower consultation process (1-2 years) but must contend with a poorer and less reliable radio path. Raising the exclusion tower height to 25 metres will greatly aid getting the antenna at or above the treetops to ensure a better path. Additionally, many locations are low elevation, far from human settlements and are not visible from any great distance.

Electric utilities are increasingly deploying private LTE and other wireless communications infrastructure to support grid modernization, operational technology, worker safety, distribution automation, and critical communications. Many of these deployments require antenna structures in the 18-25 metre range in order to clear local vegetation, industrial obstructions, or terrain while remaining significantly smaller than traditional telecommunications towers. Increasing the consultation exclusion threshold to at least 25 metres would reduce regulatory burden and accelerate deployment of critical infrastructure communications systems while having minimal impact on surrounding land use. Furthermore, expanding the exclusion to 25 metres aligns with the existing visual landscape in most municipalities. Common utility infrastructure, such as hydro poles, routinely reaches or exceeds this height—often ranging from 15 to 30 metres—and is already widely socially accepted by the public.

¹ Table 4 of the 2022 Vancouver Tree Canopy Assessment indicates that the average tree canopy height is 15 metres, available at <https://vancouver.ca/files/cov/vancouver-tree-canopy-assessment-2022.pdf>

Q11

ISED is seeking comments on gaps and/or opportunities in CPC-2-0-03 that can be considered to facilitate small cell deployment.

The RABC respectfully abstains from commenting.

Q12

ISED is seeking comments or suggestions to consider, with respect to the topics in this paper and within the scope of the authorities in the Radiocommunication Act, to enhance overall competition in the wireless telecommunications sector.

The RABC respectfully abstains from commenting.

End of Submission