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Sent via email: [PSBN-RLBSP@ps-sp.gc.ca](mailto:PSBN-RLBSP@ps-sp.gc.ca)

**Re: Consultation on a Governance Framework for a Nationwide Public Safety Broadband Network**

Dear Public Safety Officials,

We are writing in today in response to your [consultation](#) on a governance framework for a nationwide a Public Safety Broadband Network (PSBN). As an organization that encompasses public works professionals not only in Canada, but also in the United States (where a Public Safety Broadband Network is already in place), we welcome this opportunity to share best practices and challenges from our experiences in the United States, along with the expertise and experience of our Canadian members. Most of all, the CPWA believes that it is vital for public works professionals to have a seat at the table in the governance of the PSBN for there to be a successful implementation of any plan.

The Canadian Public Works Association (CPWA) was founded in 1986 to enhance the services of the American Public Works Association (APWA) to the Canadian public works community. Since that time, CPWA has become the voice of public works in Canada, with a board of directors filled by public works professionals from municipalities across Canada. Collectively, APWA and CPWA represent over 30,000 public works professionals in North America who work on both sides of the border to innovate and assure excellence in the public works profession.

Public works agencies operate and maintain critical infrastructure services that are vital to communities, such as transportation networks, energy and water supplies, sewage and refuse disposal systems, and public facilities. Public works agencies are also responsible for many aspects of emergency planning and disaster response, including assessing damage to buildings and infrastructure; clearing and disposing of debris; removing snow in blizzard conditions ahead of police, fire, and ambulance services; securing critical facilities and restoring lifeline services; managing traffic and coordinating municipal vehicles, equipment and workforce; and ensuring a safe public water supply. In 2017, APWA announced the creation of a “Public Works First Responder” symbol for use throughout North America to identify public works personnel and acknowledge their role as first responders.

In this submission, we will address select questions from the three key themes for discussion.

**Theme #1: Priorities for Realizing a Nationwide PSBN**

1.4

What measures would both support the long-term financial sustainability of a national PSBN while also realizing the TNCO's Affordability Principle (Annex C)? What ways could be considered to balance private sector and public safety interests in establishing investment priorities for the network?

Access to funding from a number of federal departments (Infrastructure Canada, Emergency Preparedness, Indigenous Services, etc.) will help to limit any funding shortfalls in the future. Having a range of price points for system users will enable communities of all sizes to join, thus enlarging the market on the private side of the agreement. We recommend that the government consider partnerships on the private side to utilize multiple existing system networks. This should allow for faster implementation and in some areas potentially create redundancy in case of any network issues.

1.5

What other kinds of approaches should be adopted to establish coverage and capacity targets, as well as measure progress toward PSBN implementation? Should coverage, resiliency and user adoption targets be mandated?

CPWA would like to point out that system coverage and resiliency on the isolated areas, such as parts of the prairies, will be an issue due to the remoteness of a number of communities, some with limited cell and internet service. Expanding cell coverage will be a vital part of establishing the network. In considering program coverage targets, there is a small portion of the population in northern areas that covers a large geographic area. This geography makes the system hard to maintain. The latest technology is not always readily available in these remote communities as well; having any system function on a number of different versions of device would help with adoption.

1.6

What measures can be taken to accelerate deployment plans and mitigate delays to implementation following the establishment of a PSBN governance structure?

Ensuring that all the right organizations have a seat at the table from the beginning will be an essential way to ensure that there are no information gaps that would cause delays and errors following the establishment of a PSBN governance structure. For example, public works first responders are attempting to provide the most direct route of restoring and maintaining lifeline services to all users. In order to manage that mission efficiently and effectively during a crisis, all first responders must be on the same page and able to communicate collaboratively. A seat at the governance table is a critical aspect to success.

## **Theme #2: Oversight and Decision Making**

### 2.1

What should the national governance structure for a Public Safety Broadband Network (PSBN) look like?

Ensuring that public works professionals have a seat at the table in the development of the PSBN is essential to facilitate the achievement of a national approach, since such an approach must be comprehensive in nature. Public works professionals in the CPWA represent all regions of the country and can therefore provide unique insights into regional challenges that the PSBN may face.

FirstNet in the United States created a Public Safety Advisory Committee (PSAC), which includes representatives from police, fire, ambulance, and government (including Indigenous government) bodies, including a seat for the APWA. CPWA recommends a similar body to inform the governance of the PSBN. In the United States, the PSAC:

- Offers FirstNet guidance, information, and subject matter expertise from a public safety perspective to ensure that user needs, requirements, and public safety operational capabilities are included in the network
- Provides subject matter expertise on concepts (e.g., policies, procedures, technologies, operational methods) developed by FirstNet
- Advises FirstNet through the creation of initial documents, plans, or reports related to the build-out, deployment, and operation of a nationwide public safety broadband network (NPSBN). The PSAC reports include subject matter related to shared intergovernmental responsibilities or administration.
- Conducts regular meetings to remain informed and up to date on FirstNet's progress.

### 2.4

Should multiple public safety Advisory Committees be established to support a Board of Directors? If so, what should each of their roles be and what issues should they cover? How should Advisory Committees be constituted?

Because of the regional differences throughout Canada, a local Advisory Committee should be established for each area to address disaster types, operational requirements, and response times.

## **Theme #3: Public Reporting Accountability**

### 3.1

What are some measures that should be taken into account for ensuring the transparency and accountability of the Board and PSBN Authority? It is important to note that a Crown Corporation would be subject to transparency and accountability measures set out in the [Financial Administration Act \(FAA\)](#), in addition to other elements included in the enabling legislation.

Keeping this Authority at 'arms-length' from direct government control will help to ensure consistency and avoid becoming embroiled in political maneuvering.

Thank you for considering our submission. Please do not hesitate to contact us further for any future discussions regarding the deployment of a Nationwide Public Safety Broadband Network.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Perkins". The signature is somewhat stylized and loops around.

Lee Perkins  
CPWA President

A handwritten signature in black ink, appearing to read "Scott Grayson". The signature is written in a cursive style with a long horizontal line extending to the right.

Scott Grayson  
CPWA CEO