



## **Public Consultation Summary Report**

**Prepared for the County of Brant**

**Bell Mobility's Proposed Telecommunication Tower and  
Wireless Telecommunications Facility**

**1289 Brant County Highway 54, Ontario**

**February 25, 2022**



70 East Beaver Creek, Suite 22  
Richmond Hill, ON, L4B 3B2  
Phone: (647) 522 - 5781  
Email: [vallari.patel@fonturinternational.com](mailto:vallari.patel@fonturinternational.com)



February 25, 2022

**Dan Namisniak, Planner**  
**Development Services Department**  
**County of Brant**  
**66 Grand River Street North, Paris, ON N3L 2M2**  
**Cell: 519-717-6994**  
**Tel: 519-442-6324 ext 3011**

**Re: Public Consultation Summary for proposed telecommunication tower at 1289 Brant County Highway 54.**

**Our File No. W4542**

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Dear Mr. Namisniak,

Please be advised that the public commenting period for the proposed Bell Mobility telecommunication tower at 1289 Brant County Highway 54 has concluded. The 33-days commenting period started December 9<sup>th</sup>, 2021 and ended January 11<sup>th</sup>, 2022. After the public consultation meeting on January 11<sup>th</sup>, the public had till January 14<sup>th</sup>, 2022 to send FONTUR their comments. No members of the public attended the public consultation meeting and we only received valid comments from one member of the public (Appendix D).

We believe Bell Mobility has demonstrated that the proposed wireless telecommunication facility meets the language and intent of Industry Canada's guideline document CPC 2-0-03 and the County of Brant Communication Tower and Communication Antenna Preferred Location Protocol.

The public was notified of the proposed tower in accordance with Section 11 of the County of Brant's consultation process. Accordingly, residents and property owners within a 500 metre radius were sent an information brochure and legal survey/site plan by the County Clerk's Office (Appendix A) that arrived on or before December 9<sup>th</sup>, 2021. A newspaper ad (Appendix B) was also placed in the Brantford Expositor for December 9<sup>th</sup>, in coordination with the mail outs. In addition, a notice sign was placed on the subject property (Appendix C).

If you have any questions or you require any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Vallari Patel' with a horizontal line extending to the right.

Vallari Patel  
FONTUR International Inc. on Contract to Bell Mobility

## Appendix A- Public Notification Brochure (Side 1)

### What about health & safety?

Health and safety are paramount to Bell Mobility (Bell). Health Canada has established electromagnetic exposure guidelines, known as Safety Code 6, to ensure the safe operation of wireless antenna installations. Bell ensures that all of its facilities operate well below the allowable limits measured, taking into account all pre-existing sources and combined effects of additional carrier co-locations.

Bell attests that the installation will respect good engineering practices including structural adequacy.

Bell attests that the radio antenna system described in this notification package will be constructed in compliance with the National Building Code of Canada which includes all applicable CSA Radio Communications Regulations.

Regulatory and consultative procedures for telecommunications antennas can be found in Industry Canada's CPC 2-0-03 Issue 5.

Bell attests that the radio antenna system described in this notification package will comply with Transport Canada / NAV Canada aeronautical safety requirements. Bell has made all necessary applications to Transport Canada and NAV Canada. Both clearances have been received and lighting or painting is not required as per Transport Canada's assessment.

### What about the environment?

Bell attests that the radio antenna system described in this notification package will comply with the Canadian Environmental Assessment Act, as this facility is excluded from assessment.

General information from Industry Canada:  
<http://strateis.ic.gc.ca/antenna>

Health Canada's Safety Code 6:  
[http://www.ic.gc.ca/epic/site/smt-ast.nsf/en\\_5f05990e.html](http://www.ic.gc.ca/epic/site/smt-ast.nsf/en_5f05990e.html)

### How do I get involved?

Bell Mobility is committed to public consultation. You are invited to the public consultation on **January 11, 2022 at 5:30pm - 7:00pm**, please email the contact below to obtain the zoom log in information.

You may also provide comments to Bell about this proposal by mail, email, or fax.

In order to ensure your comments are considered you must respond between business hours **8:30am-4:30pm by end of business day January 14, 2022 to the contact below:**

Vaillari Patel  
FONTUR International Inc.  
70 East Beaver Creek Road, Unit 22  
Richmond Hill, ON, L4B 3B2  
Fax: 866-234-7873  
Email:  
w4542.bellmobility.info@fonturinternational.com

### Your land use authority contact

Dan Namisniak  
Planner  
Development Services Department  
County of Brant  
66 Grand River Street North, Paris, ON N3L 2M2  
Cell: 519-717-6994  
Office: 519-442-6324 EXT: 3011  
dan.namisniak@brant.ca

### Your ISED Contact

Southwestern Ontario District Office  
4475 North Service Road, Suite 100  
Burlington, ON L7L 4X7  
Tel: 1-855-465-6307  
Fax: 905-639-6551  
Email: [ic.spectrumswoodspectrebdsoo.ic@canada.ca](mailto:ic.spectrumswoodspectrebdsoo.ic@canada.ca)  
ATTENTION: Tower Issue—1289 Brant County Highway 54

# Bell

## Community Notification

For a 90m Telecommunications  
Tower

Located at: 1289 Brant County  
Highway 54, Caledonia ON



Bell Site Code W4542

## Appendix A- Public Notification Brochure (Side 2)

### Your local land use authority

Telecommunication tower/antenna facilities are exclusively regulated by Federal legislation under the Radiocommunication Act and administered by Innovation, Science and Economic Development (ISED) formerly known as Industry Canada. Therefore, Provincial legislation such as the Planning Act, including zoning/bylaws, does not apply to these facilities. It is important to understand that ISED, while requiring proponents to follow the County of Brant Communication Tower and Communication Antenna Preferred Location Protocol, makes the final decision on whether or not a tower facility can be constructed. The County of Brant can only provide comments to ISED and does not have the authority to stop the construction of a telecommunication tower/antenna facility.

The County of Brant is participating in land-use consultation pursuant to Issue 5 of Industry Canada's CPC 2-0-03. In the case of a dispute between the proponent and the County, a final decision will be made by ISED.

This public notification has been designed to provide all the necessary information as required by ISED and the County of Brant Communication Tower and Communication Antenna Preferred Location Protocol (Section 11) to those properties that fall within the 500m notification radius of the subject property.

### Where will it be located?

The proposed site of the tower is on the property municipally known as 1289 Brant County Highway 54, Caledonia ON, N3W 2G9.

The geographic coordinates for the site are:

Latitude [NAD 83] N 43° 05' 36.0"

Longitude [NAD 83] W 80° 03' 23.3"

Bell strongly supports co-location on existing towers and structures. The use of existing structures minimizes the number of new towers required in a given area and is generally a more cost effective way of doing business.

### Why is a new tower required?

A radio antenna and tower are the two most important parts of a radio communication system. The antenna is needed to send and receive signals for the radio station. The tower raises the antenna above obstructions such as trees and buildings so that it can send and receive these signals clearly.

Each radio station and its antenna system (including the tower) provide radio coverage to a specific geographic area, often called a cell. The antenna system must be carefully located to ensure that it provides a good signal over the whole cell area, without interfering with other stations. In areas where there are many cells, the antennas do not need to be very high. Where the cells are larger, the antennas must be higher above the ground level in order to provide good radio coverage for the whole area.

In this case, Bell has determined the need for new antennas in the area in order to adequately provide contiguous coverage and service to our future customer base in the area of Brant County Highway 54 and Mulligan Road. Bell chose this site in order to avoid problematic situations for our future customers such as poor voice and data quality, dropped calls, or even the inability to place a mobile call in the subject area.

### What will it look like?

Bell is proposing a 90 metre Lattice Tri-pole tower to improve upon the overall poor coverage in your area.

Below is an rendering of the proposed tower structure.

The tower will be accompanied with a 25m x 25m equipment cabinet at the base.

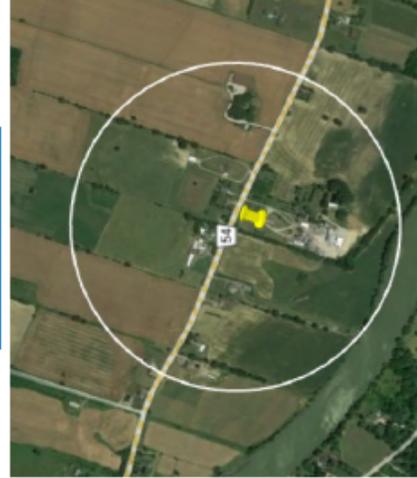


### Photo Rendering



Photo simulation looking South from Brant County Hwy 54.

### Notification Radius







# PUBLIC NOTICE

## TELECOMMUNICATION TOWER PROPOSAL

Bell Mobility, in accordance with its obligations under the *Radiocommunications Act* and Innovation, Science and Economic Development (ISED) procedure CPC-2-0-03 (2014), hereby notifies the residents in the vicinity of Brant County Highway 54 and Mulligan Road of its intentions to develop a Telecommunication Tower at the location shown here consisting of :

- A 90 metre lattice tri-pole telecommunication tower
- An equipment shelter at the base,
- and perimeter security fencing

The purpose of the proposed tower is to provide the infrastructure for carriers to improve wireless communication services in the immediate area.

### 90 Metre Lattice Tri-pole Tower 1289 Brant County Highway 54



Co-ordinates: N43°05'36.0", W80°03'23.3"

**ANY PERSON** may make a written submission to the individuals listed below before **January 14, 2022** with respect to this matter.

**PLEASE TAKE NOTICE** telecommunication tower/antenna systems are regulated exclusively by (ISED). Provincial legislation such as the Planning Act, including zoning by-laws do not apply to these facilities. Final decision will be made by ISED in the case of a dispute with the proponent and the County of Brant.

**ADDITIONAL INFORMATION** relating to the proposed tower and site will be available for review during a Virtual Public Open House on **January 11, 2022 from 5:30pm—7:00pm**. The log in information may be obtained through the following contacts:

#### Bell Mobility - contracted to:

Vallari Patel  
FONTUR International Inc.  
70 East Beaver Creek Rd, Suite  
22  
Richmond Hill, ON L4B 3B2  
Fax: 866-234-7873  
Email:  
[W4542.bellmobility.info@fonturinternational.com](mailto:W4542.bellmobility.info@fonturinternational.com)

#### LUA Contact

Dan Namisniak—Planner  
Development Services Department  
County of Brant  
66 Grand River Street North,  
Paris, ON N3L 2M2  
Cell: 519-717-6994  
Office: 519-442-6324 EXT: 3011  
Email: [dan.namisniak@brant.ca](mailto:dan.namisniak@brant.ca)

#### ISED Contact

4475 North Service  
Road, Suite 100 Bur-  
lington, ON L7L 4X7  
Tel: 1-855-465-6307  
Fax: 905-639-6551  
Email: [ic.spectrumswod@ospectrebdsoo.ic@canada.ca](mailto:ic.spectrumswod@ospectrebdsoo.ic@canada.ca)

**Appendix C – Notice Sign**



**Appendix D – Public Comments - Barry McBlain, McBlain Farms Ltd.**

**Address: 1328 Hwy #54W Caledonia, N3W 2G9 Tel:** [REDACTED]

On January 14th, 2022, Barry McBlain emailed [w4542.bellmobility.info@fonturinternational.com](mailto:w4542.bellmobility.info@fonturinternational.com) with the following comments shown below. Barry McBlain is also emailing on behalf of properties that are associated through ownership or rental agreements for lot 68,69,70,71,72 and 73. As per the County of Brant Protocol, FONTUR had acknowledged receipt within 14 days.

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**From:** [w4542.bellmobility.info](mailto:w4542.bellmobility.info)  
**To:** [REDACTED]  
**Subject:** RE: Proposed tower at 1289 Hwy 54  
**Date:** January 18, 2022 10:15:00 AM

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Good morning,

Thank you for your questions. We acknowledge receipt of your email and will be responding to your questions and concerns shortly.

Warm regards,

FONTUR International Inc.

-----Original Message-----

**From:** [REDACTED]  
**Sent:** January 14, 2022 1:54 PM  
**To:** [w4542.bellmobility.info](mailto:w4542.bellmobility.info) <[undefined@fonturinternational.com](mailto:undefined@fonturinternational.com)>  
**Subject:** Proposed tower at 1289 Hwy 54

Good afternoon. We had intended to join your zoom meeting on Tuesday night, but due to other commitments the time frame did not work. Therefore you may have already addressed the following comments or questions.

1. The proposed tower is in range of flight paths from Hamilton International Airport. What will the lighting requirements be on your proposed tower, and will there be more required than normal? What colour, and will they be continuously flashing? We have insight that the flashing lights can be a problem with reflecting into neighbouring homes and buildings. To the point that homeowners, at their expense, had to purchase non porous blinds to try and block out the light, especially at night.
2. Have you already reviewed towers in the area to accommodate your goals. That is, the new tower being built on Baptist Church Road and Brant Rd#22? Or the existing tower at the tourist centre/Hwy #54? Or the existing tower at Onondaga?
3. What exactly is the proposed tower being built to accommodate? You mention in your brochure that "the need for new antennas in the area in order to adequately provide continuous coverage and service to our future customer base in the area of Brant County Highway 54 and Mulligan Road." Unless you are aware of a population explosion in this area, the number of people you will assist with this statement, is very minimal.

We are not necessarily against the project but would like some clarification.  
Please acknowledge receipt, and thank you for the opportunity to comment on your project.

Sincerely,  
Barry McBlain  
McBlain Farms Ltd.

On February 3, 2022, FONTUR responded to Barry's comments within 60 days and provided before/after coverage maps.

**From:** [w4542.bellmobility.info](mailto:w4542.bellmobility.info)  
**To:** [REDACTED]  
**Cc:** [Dan.Namisniak](mailto:Dan.Namisniak)  
**Subject:** RE: Proposed tower at 1289 Hwy 54  
**Date:** February 3, 2022 12:04:00 PM  
**Attachments:** [W4542 - Coverage Plots - 20220201.pdf](#)

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Hi Barry,

We're sorry to hear you could not attend the zoom meeting. We'd be more than happy to answer your questions by email!

We have sent the tower proposal to Transport Canada and they have assessed that Day Protection and Night Protection will be required under CAR Standard 621.

I have confirmed with Bell that there will be medium intensity lighting at the mid-level and top-level of the proposed tower that will operate 24/7. There may also be painting requirements to meet the daytime protection standards.

We completely understand that the lighting may cause a slight inconvenience, but unfortunately, Transport Canada's requirements are non-negotiable due to aeronautical safety reasons.

As part of the planning process, we provide a justification about the existing towers in the surrounding area to Planning Staff.

The tower being constructed at Baptist Church Road and Brant Road #22 is 4.56km away.

The existing tower (W3717) at 521 Old Onondaga Road East is 6.26km away.

The tower at the tourist centre is approximately 3.27km away.

The three abovementioned towers are out of Bell's target coverage radius. Though we understand this area is not seeing an unexpected population boom, towers are typically placed 1km - 2km apart in rural settings and 300m - 500m apart in dense urban settings to provide contiguous service. The proposed tower would be built to accommodate/fill in the coverage gap that has been identified by Bell's Radio Frequency Engineering Team. Please see attached for the "Before" and "After" coverage maps for more information.

We hope this clarifies your concerns and we do apologize for the delayed response, as it took a while to prepare the coverage maps.

Could you please provide an address and phone number? This is so I can include it in the Public Consultation Summary Report that will be provided to the Planner (copied), along with your comments.

Thank you,  
The FONTUR International Team

-----Original Message-----

**From:** [REDACTED]  
**Sent:** January 14, 2022 1:54 PM  
**To:** [w4542.bellmobility.info](mailto:w4542.bellmobility.info) <[undefined@fonturinternational.com](mailto:undefined@fonturinternational.com)>  
**Subject:** Proposed tower at 1289 Hwy 54

Good afternoon. We had intended to join your zoom meeting on Tuesday night, but due to other commitments the time frame did not work. Therefore you may have already addressed the following comments or questions.

1. The proposed tower is in range of flight paths from Hamilton International Airport. What will the lighting requirements be on your proposed tower, and will there be more required than normal? What colour, and will they

be continuously flashing? We have insight that the flashing lights can be a problem with reflecting into neighbouring homes and buildings. To the point that homeowners, at their expense, had to purchase non porous blinds to try and block out the light, especially at night.

2. Have you already reviewed towers in the area to accommodate your goals. That is, the new tower being built on Baptist Church Road and Brant Rd#22? Or the existing tower at the tourist centre/Hwy #54? Or the existing tower at Onondaga?

3. What exactly is the proposed tower being built to accommodate? You mention in your brochure that "the need for new antennas in the area in order to adequately provide continuous coverage and service to our future customer base in the area of Brant County Highway 54 and Mulligan Road." Unless you are aware of a population explosion in this area, the number of people you will assist with this statement, is very minimal.

We are not necessarily against the project but would like some clarification.  
Please acknowledge receipt, and thank you for the opportunity to comment on your project.

Sincerely,  
Barry McBlain  
McBlain Farms Ltd.

**On February 3, 2022, FONTUR also notified Barry that they had 21 days to formally respond, as per the County of Brant Protocol.**

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**From:** [Vallari Patel](#)  
**To:** [REDACTED]  
**Cc:** [Dan Namisniak](#)  
**Subject:** RE: Proposed tower at 1289 Hwy 54  
**Date:** February 3, 2022 12:08:00 PM

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Hi Barry,

An additional note: As per section 12 of the County of Brant Telecom Protocol, please note you have 21 days if you wish to respond.

Warm regards,  
Vallari

-----Original Message-----

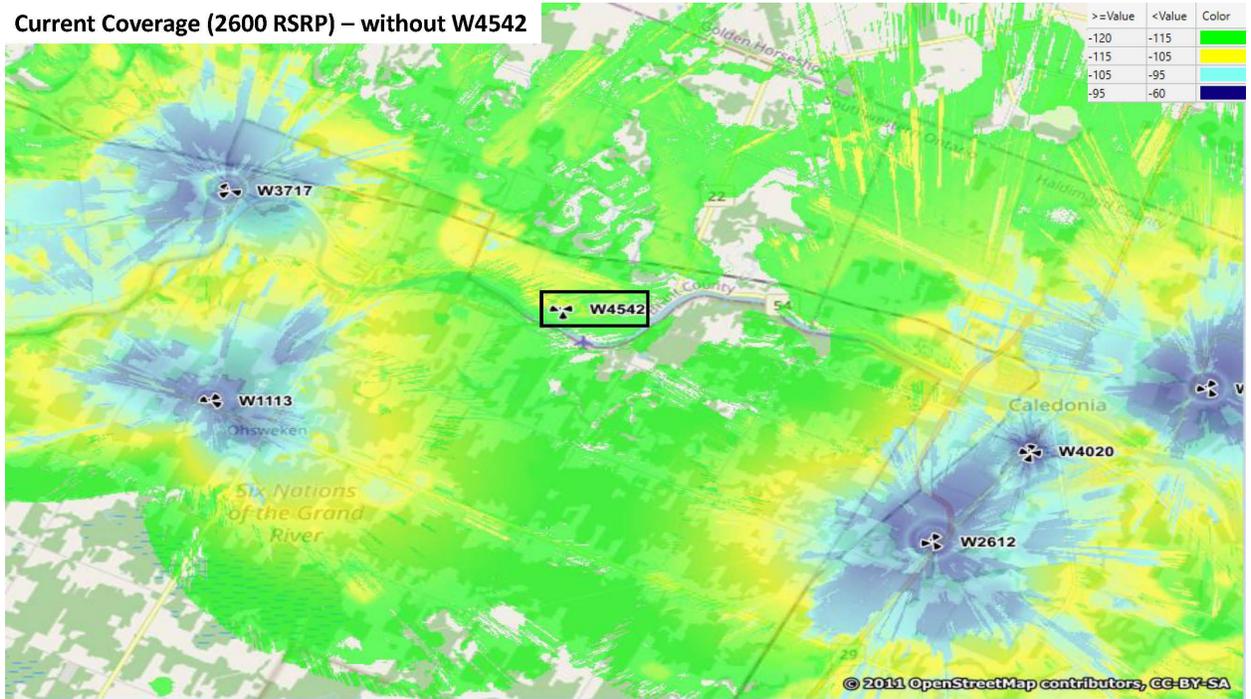
From: w4542.bellmobility.info  
Sent: February 3, 2022 12:04 PM  
To: [REDACTED]  
Cc: Dan Namisniak <dan.namisniak@brant.ca>  
Subject: RE: Proposed tower at 1289 Hwy 54

Hi Barry,

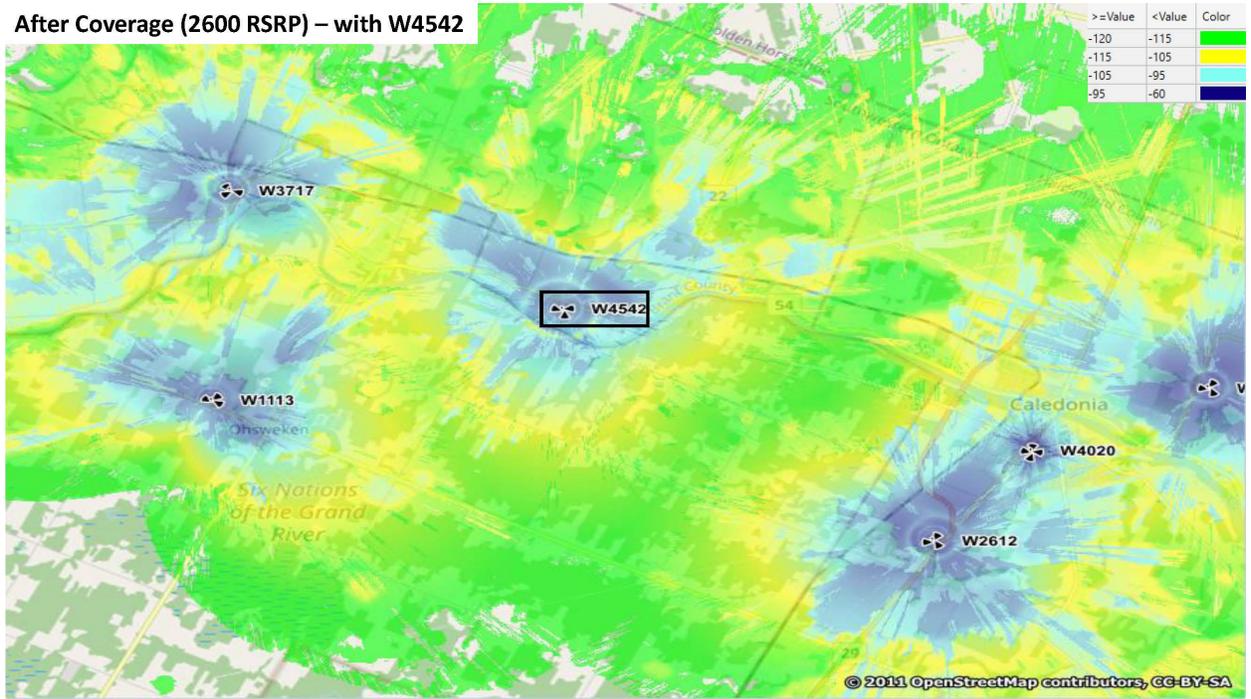
We're sorry to hear you could not attend the zoom meeting. We'd be more than happy to answer your questions by email!

We have sent the tower proposal to Transport Canada and they have assessed that Day Protection and Night Protection will be required under CAR Standard 621.  
I have confirmed with Bell that there will be medium intensity lighting at the mid-level and top-level of the proposed tower that will operate 24/7. There may also be painting requirements to meet the daytime protection standards.

Current Coverage (2600 RSRP) – without W4542



After Coverage (2600 RSRP) – with W4542



On February 12, 2022, Barry responded back with more comments and questions.

**From:** [Barry McBlain](mailto:Barry.McBlain)  
**To:** [w4542.bellmobility.info](mailto:w4542.bellmobility.info)  
**Cc:** [Dan Namisiak](mailto:Dan.Namisiak); [Brian Coleman](mailto:Brian.Coleman)  
**Subject:** Re: Proposed tower at 1289 Hwy 54  
**Date:** February 12, 2022 3:21:47 PM  
**Attachments:** [Proposed Bell Tower \(3\).docx](#)

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Hi Vallari. See attached, for further communication and questions on the proposed Bell tower at 1289 Hwy #54.  
Barry

On Thu, Feb 3, 2022 at 12:04 PM [w4542.bellmobility.info](mailto:w4542.bellmobility.info) <[undefined@fonturinternational.com](mailto:undefined@fonturinternational.com)> wrote:

Hi Barry,

We're sorry to hear you could not attend the zoom meeting. We'd be more than happy to answer your questions by email!

We have sent the tower proposal to Transport Canada and they have assessed that Day Protection and Night Protection will be required under CAR Standard 621. I have confirmed with Bell that there will be medium intensity lighting at the mid-level and top-level of the proposed tower that will operate 24/7. There may also be painting requirements to meet the daytime protection standards.

We completely understand that the lighting may cause a slight inconvenience, but unfortunately, Transport Canada's requirements are non-negotiable due to aeronautical safety reasons.

As part of the planning process, we provide a justification about the existing towers in the surrounding area to Planning Staff.

The tower being constructed at Baptist Church Road and Brant Road #22 is 4.56km away. The existing tower (W3717) at 521 Old Onondaga Road East is 6.26km away. The tower at the tourist centre is approximately 3.27km away.

The three abovementioned towers are out of Bell's target coverage radius. Though we understand this area is not seeing an unexpected population boom, towers are typically placed 1km - 2km apart in rural settings and 300m - 500m apart in dense urban settings to provide contiguous service. The proposed tower would be built to accommodate/fill in the coverage gap that has been identified by Bell's Radio Frequency Engineering Team. Please see attached for the "Before" and "After" coverage maps for more information.

We hope this clarifies your concerns and we do apologize for the delayed response, as it took a while to prepare the coverage maps. Could you please provide an address and phone number? This is so I can include it in the Public Consultation Summary Report that will be provided to the Planner (copied), along with your comments.

Thank you,  
The FONTUR International Team

February 10, 2022

Thank you, Vallari, for your recent response to my questions, and the opportunity to comment. Unfortunately, your answers have raised more concerns and questions in regards to the proposed Bell communications tower.

In no particular order:

1. Lighting requirements. You have stated in your Community Notification - "public notification has been designed to provide all the necessary information as required by ISED....." This appears to contradict what is actually going to happen. Your public notification, quote – "Bell attests that the radio antenna system described in this notification package will comply with Transport Canada/NAV Canada aeronautical safety requirements. Bell has made all necessary applications to Transport Canada and NAV Canada. Both clearances have been received and lighting or painting is not required as per Transport Canada's assessment." Your answer to my question – "We have sent the tower proposal to Transport Canada and they have assessed that Day Protection and Night Protection will be required under CAR Standard 621. I have confirmed with Bell that there will be medium intensity lighting at the midlevel and top-level of the proposed tower that will operate 24/7. There

may also be painting requirements to meet the daytime protection standards.” Two exact opposite responses to the same question. If the assessment changed after notifying the public, this should have been communicated. A perceived acceptance by neighbour’s based on no lighting, may have generated more questions, if what you are actually doing had been properly conveyed. Can you explain this discrepancy? There is a concerning lack of transparency here.

2. You state in your answer – “We completely understand that the lighting may cause a slight inconvenience, but unfortunately, Transport Canada’s requirements are non-negotiable due to aeronautical safety reasons.” Based on previous applications, would you not have assumed this lighting would be a safety requirement? Especially when the site is relatively close to Hamilton International Airport. Instead, there is a Community Notification released assuring us no lighting would be required.
3. In regards to your quote above “may cause a slight inconvenience”. What is your definition of slight inconvenience? Maybe, not sleeping at night due to flashing lights reflecting into your bedroom? Not being able to watch the 11:00 news due to reflecting light flashing into your house? How about exacerbating migraines due to the reflecting lights coming into your home?

For this “slight inconvenience”, the shareholders of Bell and the landowners, benefit financially.

4. You apologized for a delayed response (January 14/22 to February 3/22) to my questions based on “it took a while to prepare the coverage maps”. I find this an odd statement. It appears the proposed property is perfect, based on your statement in your Community Notification, “Bell chose this site in order to avoid problematic situations for our future customers such as poor voice and data quality, dropped calls, or even the inability to place a mobile call in the subject area.” How could you have completed due diligence and come up with a proposed location, without knowing what your coverage area will be? These maps should have been one of the first things to complete in order to find the proper location. Along with mapping existing towers and possible usage.
5. The current site is zoned agriculture. If the tower is built, will the assessment change? Are you applying for re-zoning?
6. Why is there such a large building (25mX25m) required at the base? Is the building permit based on agricultural or commercial standards?
7. What is the tower going to be used for? Telecommunication is a broad term. Does it include 5G or newer technology? Are there any concerns about

human health effects for any aspect of this “telecommunication”, and is testing still ongoing?

8. It appears your statement in the Community Notification “continuous coverage and service to our future customer base in the area of Brant County Highway 54 and Mulligan Road” is very misleading or not well researched. Let us assume there are 50 people in the area of Mulligan Road/54. Half of these might be on the Bell network. You are going to spend several million dollars to service 25 people? If your target population area is larger, you should be up front and acknowledge this. Or should this restrictive coverage area have been corrected or expanded?
9. From an article in the Brantford Expositor on February 6, 2022 (Vincent Ball), the minimum distance for any telecommunication tower in the County of Brant, from a residence, is 195 metres. Based on this information your proposed project appears to be non-compliant.
10. You state that “towers are typically placed 1km – 2km apart in rural settings”. Is this a future goal or just a statement? Living, and driving in rural Ontario, there are not many “typical tower” placements – at least not yet. This may be financially positive for the telecommunication companies, but the

aesthetic and land usage implications to rural Ontario, are unimaginable - if towers are placed 1-2km apart as you state.

Again, we appreciate the opportunity to comment and look forward to your response.

Sincerely,

Barry McBlain

Mailing address – 1328 Hwy #54W Caledonia, N3W 2G9

Phone # [REDACTED]

Properties we are associated with either through ownership or rental agreements, and reached with your Community Notification -

Lot 68,69,70,71,72 and 73.

On February 22, 2022, FONTUR responded back with the following comments.

**From:** [w4542.bellmobility.info](mailto:w4542.bellmobility.info)  
**To:** Barry McBlain  
**Cc:** Dan Namisniak; Brian Coleman; [REDACTED]  
**Subject:** RE: Proposed tower at 1289 Hwy 54  
**Date:** February 22, 2022 11:25:00 AM

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Hi Barry,

We sincerely apologize for the administrative error that was made in the brochure, it should have said, "Both clearances have been received and lighting or painting is required as per Transport Canada's assessment". We did make the necessary applications to both TC and NAV Canada. They have assessed that Day and Night Protection will be required under CAR Standard 621.

I can confirm that we have completed our due diligence regarding our proposed location. Bell Mobility has their network requirements and internal review processes, starting with their Radio Frequency Engineers who determine coverage gaps. This is followed by site acquisition and municipal approvals work. There was a delayed response because internal approvals were needed to share the coverage maps with members of the public, not because they did not already exist. We will not be re-zoning the property, as Zoning By-Laws do not apply to Federal undertakings such as telecommunication applications. It is a 25m-by-25m fenced compound that will have a cabinet shelter at the base. No building permit is required, as it's not a building. The size of the compound is determined by the needs of Bell's construction team.

The proposed tower will host 4G and 5G technology. All telecommunication services providers are obligated to follow the regulation limits set in Safety Code 6, which can be found here: <https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines.html>. The target coverage area can be best visualized in the coverage maps provided earlier. Telecommunication applications are completed in accordance with the *County of Brant Communication Tower and Communication Antenna Preferred Location Protocol*, which states to generally locate towers in employment, industrial, commercial, and rural land uses. We understand this is the type of infrastructure that is unappealing, but to properly address coverage needs, infrastructure needs to be placed somewhat closely to travel corridors and residential uses. 1km to 2km is the general trend of tower placements and that varies on a case-by-case basis. There are many factors that determine where towers are placed, such as topography, dropped call rates and complaints, and radio frequency analysis.

Please note that all your comments and concerns will be documented in our Public Consultation Summary Report that will be submitted to the Planning Staff. You will also have another opportunity to voice your concerns in front of the County of Brant Council.

Thank you,  
The FONTUR International Team

**END**