

August 11, 2021

Ms. Josette Gallant
Senior Director, Terrestrial Engineering and Standards
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5
(Submitted by email spectrumengineering-genieduspectre@ised-isde.gc.ca)

Subject: ***Consultation on Amendments to SRSP-520, Technical Requirements for Fixed and/or Mobile Systems, Including Flexible Use Broadband Systems, in the Band 3450-3650 MHz***

Dear Ms. Gallant,

On August 6, 2021, the Department initiated a very short 15-day technical consultation on proposed amendments to Standard Radio System Plan SRSP-520, *Technical Requirements for Fixed and/or Mobile Systems, Including Flexible Use Broadband Systems, in the Band 3450-3650 MHz*. Comments on the consultation must be submitted by August 21, 2021.

RABC would normally assign this consultation to one of its committees for review, and we would gather input from our members to provide the Department with consensus advice regarding the proposed changes. Unfortunately, the Board is unable to provide a meaningful technical response to the Department that encompasses the views of all its members in such a short timeframe. Many of the experts required to review the proposed changes are currently on summer vacation.

This is an important matter. The proposed modifications place limitations or restrictions on using the 3500 MHz spectrum. An assessment of the proposed modifications is required to evaluate the magnitude of the impact of at least the following aspects:

- Performance, especially the coverage range and possibly capacity of the 3500 MHz flexible use band, noting that these mid-band ranges are quite suited to providing both coverage and capacity; and
- The increase of operation complexity to comply with the proposed requirements.

We understand the Department faces pressure to update the standard prior to the first new deployments at 3500 MHz. However, the Department has not provided the studies it mentioned in the SAB-001-21, pointing to possible interference from 3500 MHz. This makes it very challenging for stakeholders to evaluate whether the proposed modifications to outdoor antenna tilt requirements and the proposed exclusion zones (as described in SRSP-520), are appropriate, and to possibly propose alternate technical solutions that can still adequately protect radio altimeter operation. More time is required for the technical analysis.

Accordingly, we hereby request an extension to the closing date for this important consultation. RABC recommends the closing date be extended to October 21, 2021. This will provide enough time for a thorough technical analysis of the proposed changes.

Sincerely,



J. David Farnes
General Manager