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(Submitted by email: spectrumengineering-genieduspectre@ised-isde.gc.ca)

**Re: Canada Gazette Notice No. SMSE-006-22 -
Proposed Revisions to the Canadian Table of Frequency Allocations, 2022 Edition**

The Radio Advisory Board of Canada (RABC or the Board) is pleased to respond to the above noted consultation. The response was developed by a special working group of the Board. The consultation has broad interest amongst RABC members, with approximately forty stakeholder participants actively involved in developing the response.

Section 6.2

Footnote C52

RABC believes Footnote C52 as presented in the consultation document requires clarification. While the footnote references future consultations to consider High Altitude Platform Systems, the footnote does not reference services already allocated on a primary basis. As such, RABC proposes the addition of one additional sentence to Footnote C52 (the proposed sentence is underlined below):

C52 (CAN-00 19) Use of the frequency bands 21.4-22 GHz, 24.25-27.5 GHz, 31-31.3 GHz, 38-39.5 GHz, and 47.2-48.2 GHz by High Altitude Platform Systems (HAPS) will be governed by spectrum utilization policies which will be formulated in the future. Development of such policies will take into consideration use of these bands by services allocated on primary basis to avoid any constraints on their current and future development.

Footnote 5.446A

It is proposed to update Canadian Footnote C39B by adding a reference to the reservation Canada took for the band 5150-5250 MHz at WRC-19 (as noted in the Final Acts of WRC-19). Such clarification is needed to ensure that Footnote C39B takes precedence over the application

of Resolution 229 (Revised WRC-19), for use of the band 5150-5250 MHz for RLAN's. This is to ensure that outdoor use of RLAN's with higher power and other conditions (as provided for in the Canadian spectrum utilization policies and associated technical and operational standards), apply as per Canada's reservation in the Final Acts of WRC-19.

RABC therefore proposes the addition below (underlined):

C39B (CAN-21) The use of the frequency bands 5 150-5 250 MHz, 5 250-5 350 MHz and 5 470-5725 MHz by the mobile service is in accordance with spectrum policy and technical and operational established for the implementation of wireless local area networks and devices. It is noted that in the Final Acts of WRC-19, Canada reserved its right to operate stations in the mobile service in the frequency band 5 150-5 250 MHz at higher power levels and subject to other conditions than those contained in Resolution 229 (Rev WRC-19).

Section 6.4

In Section 6.4, Satellite services, RABC observed that the consultation document does not include a summary table for uplinks in the 27.5-29.5 GHz frequency range. Such table could have accompanied Table 23: Summary of proposed changes to the Canadian Table 17.7-19.7 GH, which is included in the consultation document. RABC is providing, for information, a table summarizing proposed changes to the Canadian Table for 27.5-29.5 GHz. This table is labeled "Table 23b" (below), which reflects the Board's understanding of the outcomes of recent ISED consultations which should be reflected in the new Canadian Table.

**Table 23b: Summary of proposed changes to the Canadian Table
27.5-29.5 GHz**

27.5 - 28.5	FIXED FIXED-SATELLITE (Earth-to-space) 5.484A <u>MOD</u> 5.516B <u>ADD</u> <u>5.517A</u> 5.539 MOBILE 5.538 5.540 C16F C47A
28.5 - 29.1	FIXED FIXED-SATELLITE (Earth-to-space) 5.484A <u>MOD</u> 5.516B <u>ADD</u> <u>5.517A</u> 5.523A 5.539 C16K MOBILE 5.540 C16F

29.1 - 29.5

FIXED

FIXED-SATELLITE (Earth-to-space) MOD 5.516B ADD 5.517A 5.523C

5.523E 5.535A 5.539 5.541A C48

MOBILE

5.540 C16F C16G

Section 6.6 – Other Modifications to the Canadian Table (SUP 5.317)

ISED proposes to suppress footnote 5.317.

Hybrid terrestrial-satellite communication networks have the potential to provide continuous wide-area mobile coverage to underserved and unserved rural and remote regions of Canada, particularly in the Far North. This technology is currently undergoing trial and will likely become available in Canada within the next three to five years. Such services will likely be best accomplished using spectrum that is geographically continuous from coast-to-coast and broadly available in current handsets. Spectrum such as 850 MHz cellular band and PCS bands are candidates that can accommodate hybrid terrestrial-satellite communications. The near-term availability and potential benefits to Canadians living in deep rural and remote areas from this ubiquitous connectivity, including lifesaving search-and-rescue support, warrants maintaining MSS primary allocation in 806-890 MHz and not suppressing footnote 5.317.

Conclusion

This response was sent to RABC Sponsor Members for ballot: 11 Sponsor Members voted to approve (Bell, Canadian Association of Chiefs of Police, Canadian Association of Wireless Internet Service Providers, Canadian Electronics and Communications Association, Canadian Satellite and Space Industry Forum, Department of National Defence, Model Aeronautics Association of Canada, Radio Amateurs of Canada, Railway Association of Canada, Royal Canadian Mounted Police, and TELUS); 1 Sponsor Member voted to approve, with comment (Rogers Communications Canada Inc.); and 6 Sponsor Members abstained (Canadian Association of Broadcasters, Canadian Association of Broadcast Consultants, CBC/Radio Canada, Electricity Canada, Global Automakers of Canada, and NAV CANADA).

The Sponsor Members' comments (which form an integral part of the RABC response), are as follows.

Rogers

1. While Rogers continues to oppose the proposal to suppress footnote 5.317, the Department should ensure that all existing primary allocated terrestrial mobile service licensees are protected from any potential mobile-satellite services.
2. In addition, while reviewing the proposal to suppress footnote 5.317, Rogers identified that mobile-satellite service on a primary basis is only allowed in 806-890 MHz and does

not include the additional 4 MHz (890-894 MHz), which is part of cellular telephony within the frequency range 824 to 894 MHz. ISED may wish to consider updating the CTFA to also include 890-894 MHz. One potential approach could be the addition of a Canadian specific footnote allowing use of mobile-satellite service on a primary basis within 890-894 MHz.

The Board appreciates the opportunity to respond to this important consultation.

Sincerely,



J. David Farnes
General Manager