RADIO ADVISORY BOARD OF CANADA
CONSEIL CONSULTATIF CANADIEN DE LA RADIO

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(Submitted by email: spectrumoperations-operationsduspectre@ised-isde.gc.ca)

Re: Canada Gazette Notice No. DGSO-001-22 - *Consultation on Amendments to Requirements for Spectrum Licensees to Submit Technical Information about Sites*

Introduction

The Radio Advisory Board of Canada (RABC or the Board) is pleased to respond to the above noted consultation. The response was developed by the Board's Spectrum Management Innovation Committee. The RABC welcomes ISED's initiative to simplify the technical information submission process. The current process consumes excessive time and resources on the part of participating operators, and the RABC is pleased that ISED has recognized this burden and is taking steps to alleviate it.

Responses

Question 1

ISED is seeking comments on its proposals for the addition of new site data elements, the revision of a number of elements, and the phasing out of certain elements, as described above in sections 4.1 to 4.5 above.

Answer 1

The RABC would like to clarify ISED's expectations for the data element **Site Control**. RABC's understanding is as follows:

a. In general, an operator would be their own Site Control.
b. In the case where Operator A is collocated on a tower owned by Operator B, then Operator A would report Operator B as Site Control.
c. In the case where Operator A and Operator B are located on a tower owned by a third party, both Operator A and Operator B would report the third party tower owner as Site Control.

d. In the case where Operator A and Operator B are both located on a rooftop, having installed their own antenna masts on that rooftop, both Operator A and Operator B would report themselves as Site Control.

The RABC notes that this data field would be somewhat onerous for some operators to supply, as this requires a cross-reference to a real estate database that may not be configured in a way that makes this information readily accessible. However, the RABC has no objection to the proposed new Site Control data element.

The RABC is concerned that the proposed **Site ID** field presents some challenges to implementation.

The RABC understands ISED's proposal as follows:

a. In general, an operator would report their own internal Site ID.
b. In the case where Operator A is collocated on a tower owned by Operator B, then Operator A would report the Site ID used internally by Operator B.
c. In the case where Operator A and Operator B are located on a tower owned by a third party, both Operator A and Operator B would report a common Site ID, either determined by the tower owner or by mutual agreement.
d. In the case where Operator A and Operator B are both located on a rooftop, having installed their own antenna masts on that rooftop, both Operator A and Operator B would report their own internal Site IDs.

The scenarios (b) and (c) above present two concerns.

1. Operators currently have their own internal Site ID nomenclature systems. Another operator's Site ID would be stored in a real-estate data storage mechanism, which cannot readily be cross-referenced to system that assembles the technical data upload. Including this information in the data upload would be an onerous and potentially error-prone process.
2. There is the potential for data collisions, that is, two different operators may inadvertently use the same internal Site ID for different sites. Should such a duplicate Site ID be associated with a shared site, the database would present confusing information.

The RABC does not believe that the proposed requirement to use common Site IDs for shared sites is feasible at this time. While it may be feasible to establish a universal unique Site ID nomenclature system, such an undertaking would require several years to define, approve, and implement. The Site Control data element will provide information regarding whether a site is shared or not; and should be considered adequate at this time.

The RABC supports the other proposed changes described in Sections 4.1 - 4.5 of the consultation.

Question 2 *ISED is seeking comments on the process for transition to the new site data element requirements.*

Answer 2

The RABC supports ISED's proposed six-month transition period. The RABC notes that if ISED wishes to implement a common Site ID nomenclature mechanism to ensure unique Site IDs across all operators, then six months is inadequate to establish such a system.

Question 3 *ISED is seeking comments on its proposal to require that all licensees provide technical information:*

Answer 3

The RABC has no objection to ISED's request for a modest action, on a monthly basis, to confirm that there either no changes to deployments in a licence, or no deployments to date in a licence. The RABC urges ISED to ensure that this required action is simple, straightforward, and quickly conducted.

The RABC strongly objects to ISED's proposed requirement for the provision of technical information prior to a site becoming operational, for two reasons:

1. It is generally not practical to provide technical information prior to deployment, since the proposed technical details of the deployment typically change frequently in the years, months, weeks, and indeed days before the deployment. Such data is, therefore, unlikely to be useful for conducting interference co-ordination.
2. Proposed deployment data and related technical data ise considered commercially sensitive information and future build information cannot be made publicly available to competitors.

Question 4 *ISED is seeking proposals on how licensees might distinguish between planned and operational radiocommunication installations within the site data upload.*

Answer 4

As noted in response to Question 3, the RABC does not support the proposed requirement for the submission of technical information before a site becomes operational. If ISED determines that it will implement this requirement, the RABC would support an option to include technical information of proposed stations in the submission data. Each record, then, would include one of three flags:

a. Private Data (do not publish), non-operational site
b. Public Data (may be published), non-operational site
c. Operation site (always public, always published)

While ISED may request an in-service date for non-operational sites, this information should be considered proprietary and commercially sensitive and should be kept confidential. When a station is flagged as private and non-operational, ISED should not automatically publish the site data (i.e., change the flag to operational or public non-operational) on the anticipated in-service date. Rather, ISED should only publish station data when the operator flags the station as operational or public non-operational. Deployments are often delayed, and ISED should not risk publishing commercially sensitive data if an operator inadvertently neglects to change the in-service date.

Question 5 *ISED seeks comments on its proposal that the CSV format be the exclusive file format for site uploads at this time.*

Answer 5

The RABC supports the use of the .csv file format.

Question 6 *ISED seeks comments on its proposal that licensees would be required to use the upload system provided, unless ISED specifically approves another method for a particular licensee.*

Answer 6

The RABC proposes that ISED work towards implementing an API that could be used to automatically upload data, potentially using a .json or similar standard format. This would make the upload process more automated and more robust, particularly for large operators that submit numerous files and very large files.

Question 7 *ISED invites proposals of other measures to streamline or improve the efficiency of the site data upload process. Respondents should include a rationale and discussion of the implications of the proposal for licensees and ISED. ISED will consider suggestions and may further explore the feasibility of their later implementation.*

Answer 7

The RABC proposes that ISED implement a system that will automatically detect the licence band and service area implicated in an upload file.

Automatic licence detection would be especially helpful in the case where an operator has a single station that operates in a frequency that spans several licence blocks. Currently, the operator must manually separate that station into several separate station entries, one for each

licence. This process is cumbersome. Automatic detection of the licences implicated in that station would improve the upload process.

The RABC proposes that ISED publish geo-referenced files of the service areas. Several members have reported that certain site co-ordinates have been rejected as invalid, in particular, for locations on the coast and near service area boundaries.

The RABC proposes that ISED provide improved error logs that specify the line and the field of the data element that is invalid. The RABC also proposes that ISED provide warning messages, clearly distinguished from error messages, to flag unusual values (for example, unusually high values of Transmitter TCP-TRP or Antenna Height).

Conclusion

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

Sincerely,

J. David Farnes
General Manager