



May 4, 2023

Ms. Josette Gallant  
Senior Director, Terrestrial Engineering and Standards  
Engineering, Planning and Standards Branch  
Innovation, Science and Economic Development Canada  
235 Queen Street, 6<sup>th</sup> Floor  
Ottawa, ON, K1A 0H5  
(Submitted by email)

**Subject: RSS-247, Draft Issue 3**

Dear Josette Gallant,

In February 2023, the Department requested that RABC review draft Issue 3 of Radio Standards Specifications (RSS) -247 – *Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices*. The Board assigned the review of the standards to its Fixed Wireless Communications Committee (FWCC). At the request of the Department, RABC also posted the draft of RSS-247 Issue 3 on its website to facilitate comments from Canada’s World Trade Organization (WTO) partners.

When the new draft was provided to RABC, the Department requested the Board focus its review on modifications the Department proposed making to reflect the Department’s recent decision on Radio Local Area Network Devices in the 5850-5895 MHz Band and for Intelligent Transportation Systems in the 5895-5925 MHz Band. The Department also indicated it intends to undertake a more thorough revision to the rest of standard later this year.

With the narrow focus in mind, the FWCC held two calls to review the standard and provide initial feedback to the Department. The FWCC has several recommended changes to the draft which are captured with track changes in the attached RABC mark-up of RSS-247. Additionally, some RABC members have indicated they are eager for the Department to launch a further consultation as they have additional comments regarding the rest of the standard.

Finally, RABC received three sets of comments from one organization via the WTO portal on the Board’s website. These comments have been forwarded to the Department for consideration.

The Board has now completed its review. We appreciate having had the opportunity to review the updated standard.

Sincerely,



J. David Farnes  
General Manager

Attachment