



June 29, 2023

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)

Subject: RSS-252, Draft Issue 2

Dear Josette Gallant,

In May 2023, the Department requested that RABC review the draft second issue of Radio Standards Specifications (RSS) - 252 – *Intelligent Transportation Systems' (ITS) On-Board Units (OBUs) in the 5895 – 5925 MHz Band*. The Board assigned the review of the standard to the Advanced Wireless Services Subcommittee (AWS subcommittee) of the Mobile & Personal Communications Committee. Interested stakeholders from the intelligent transportation community were also invited to participate as guests in the review. At the request of the Department, RABC also posted the draft of RSS-252 Issue 2 on its website to facilitate comments from Canada's World Trade Organization (WTO) partners.

The AWS subcommittee held one meeting to review the revised standard. It was observed that the unwanted emission limits in Section 5.3 of draft RSS-252, Issue 2, follow the Federal Communications Committee (FCC) November 2020 FNPRM in ET Docket No. 19-138 and are based on DSRC technology that will no longer be used. The FCC first proposed these limits in its December 2019 NPRM in ET Docket No. 19-138 for a 20 MHz C-V2X channel from 5905-5925 MHz when the agency was considering adjacent channel compatibility between C-V2X and DSRC. But, when the FCC decided to phase out DSRC and allocate the entire 30 MHz ITS band to C-V2X, the agency did not revise its unwanted emission limits proposal for a 20 MHz C-V2X channel and instead proposed the same unwanted emission limits for a 30 MHz C-V2X channel. These limits are based on the DSRC 802.11p standard that is being phased out. Also, there is no need to protect adjacent channel DSRC operations in 5895-5905 MHz because, like the FCC, ISED has decided to reallocate the entire 30 MHz ITS band to C-V2X.

RABC is aware of proposals to the FCC to modify the proposed unwanted emission limits in Section 5.3 of Draft RSS-252, Issue 2, to follow 3GPP standards for (C-V2X), as provided below, and not the 802.11p standard (for DSRC) that is being phased out in Canada and in the U.S.

Harmonization with the US standard would likely be very beneficial to the Canadian ITS market. However, it is unclear whether the FCC will modify its rules to adopt the 3GPP standards. RABC recommends the Department monitor the FCC's rulemaking and consider adopting any modification to the unwanted emission limits by the FCC.

If the FCC adopts the 3GPP standard, the corresponding limits in RSS-252 would be:

5.3 Unwanted emissions.

Average conducted power measured at the antenna input shall not exceed:

- a) -16 dBm/100 kHz within 0 to 1 megahertz from the upper band edge (i.e., 5925 MHz) and within -1 to 0 megahertz from the lower band edge (i.e., 5895 MHz);
- b) -13 dBm/MHz within 1 to 5 megahertz from the upper band edge and within -5 to -1 megahertz from the lower band edge;
- c) -16 dBm/MHz within 5 to 30 megahertz from the upper band edge and within -30 to -5 megahertz from the lower band edge;
- d) -28 dBm/MHz beyond 30 megahertz from the band edges.

Finally, RABC received one comment via the WTO portal on the Board's website. This comment was 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