

March 21, 2025

Shari Scott
Senior Director, Space Services and International
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5
(Submitted by email)

Subject: SRSP-103, Draft Issue 1

Dear Shari Scott,

Introduction

In February 2025, the Department requested that RABC expedite a review of draft issue 1 of Standard Radio System Plan (SRSP)-103, – *Technical Requirements for Space Stations providing Supplemental Mobile Coverage by Satellite*. The Board assigned the review of the standard to the Advanced Wireless Services subcommittee (a subcommittee of the Mobile & Personal Communications Committee).

The Committee held four meetings to review the new standard, during which feedback was provided to the Department. The Board's general comments are provided below. Attached to this letter is a version of the draft SRSP that includes some specific recommendations from the Board, highlighted using tracked changes for ease of reference.

Comments

Out of Band Emissions (OOBE)

The working group discussions of the requirements for the protection of terrestrial systems operating in adjacent blocks was the main focus of the AWS subcommittee review. Mid band OOBE was the particular focus. While ISED has proposed exactly what the RABC recommended as part of the RABC response to the Consultation on a Policy, Licensing and Technical Framework for SMCS (SMSE-006-24), working group members raised the issues of aggregation as well as polarization loss. The counterbalancing impacts were discussed at length and it was agreed that a mid band OOBE PFD in the range of -113.6 to -114.5 represents the best trade off between protection and service efficacy.

Section 4 Heading

The heading for Section 4 describes the section as being general guidelines. The Board believes these are not guidelines in section 4, but rather these are requirements (e.g. meeting protection criteria of RA.769).

Sections 5 and 6 Headings

The headings for these sections describe the requirements as being general requirements. However, the sections specify specific requirements (pfd limits). The Board recommends removing the word “General” in the headings. We also propose specific wording changes to the titles for each section.

Terminology

It was observed that the draft issue of this standard uses “must” to express requirements. In many other standards published by the Department, “shall” is used to express requirements. The Department may want to review this.

Conclusion

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

Sincerely,



J. David Farnes
General Manager

Attachment