RADIO ADVISORY BOARD OF CANADA
CONSEIL CONSULTATIF CANADIEN DE LA RADIO

May 30, 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-102, Draft Issue 2

Dear Shari Scott,

Introduction

In March 2025, the Department requested that RABC review of draft issue 2 of Standard Radio System Plan (SRSP)-102, – *Band-Specific Technical Requirements for Earth Stations in the Fixed-Satellite Service.* The Board assigned the review of the standard to the Advanced Wireless Services subcommittee (a subcommittee of the Mobile & Personal Communications Committee).

Comments

The Committee held one meeting to review the new standard. RABC recommends the following addition to the draft standard in the second bullet of section B.2.3 (shown in **bold** below).

B.2.3 Earth station siting requirements

For each contour associated with an earth station site approval, the applicant is required to meet the following siting restriction requirements:

- **Avoidance of urban areas:** Any proposed transmit contour cannot overlap with Metro Tier-5 service areas, LPCs and MPCs
- **Avoidance of NCL licensed areas:** Any proposed transmit contour must not geographically intersect with any NCL licensed area already authorized on overlapping frequencies at the time of application**, unless the applicant and the NCL licence holder reach an agreement on coexistence in the NCL licensed area. This restriction only applies if the NCL licence holder has met its deployment requirement mentioned in SPB-001-25, paragraph 38.**

There is concern about the rigidity of this requirement. It is requested that the option of coordination with the NCL licensee to achieve coexistence be added. Further, in keeping with paragraphs of 38 and 39 of SPB-001-25, the standard should that this condition only applies if

the NCL licensee has deployed at least one transmitting site within the licensed area, and that it is not engaging in anti-competitive behavior and/or spectrum warehousing. The proposed text is intended address its concern.

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