

June 2, 2025

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: Technical and Operational Standards Covering the mmWave Band

Dear Josette Gallant,

In March 2025, the Department requested that RABC review draft issues of four of standards that apply to the millimetre wave band. Namely:

- RSS-193, Draft Issue 1 - *Flexible Use Broadband Equipment Operating in the Band 27.5-28.35 GHz*
- RSS-102.IPD.MEAS, Draft Issue 2 - *Measurement Procedure for Assessing Incident Power Density (IPD) Compliance in Accordance with RSS-102*
- RSS-102.IPD.SIM, Draft Issue 2 - *Simulation Procedure for Assessing Incident Power Density (IPD) Compliance in Accordance with RSS-102*
- SRSP-522, Draft Issue 1 - *Technical Requirements for Non-Competitive Local Licensed Systems, including Fixed and/or Mobile Systems, and Flexible Use Broadband Systems, in the Band 27.5-28.35 GHz*

The review of RSS-193 and SRSP-522 was assigned to the Advanced Wireless Services Subcommittee. The subcommittee held one meeting to review the standards. The review of the two RSS-102 related standards was assigned to the Electromagnetic Compatibility Committee. The Committee held one meeting to review the standards.

RABC members did not express any concerns with RSS-102.IPD.MEAS, Draft Issue 2 or RSS-102.IPD.SIM. As such, RABC recommends the Department publish the revised standards as drafted.

Regarding RSS-193, RABC supports the proposed P_{MAX} defined by ISED. These power levels align with global specifications, enabling NCL users to access a wide ecosystem of base stations and subscriber equipment.

Furthermore, to align with international regulations like the FCC, RABC recommends using e.i.r.p. alone as a measurement for the maximum power of AAS equipment (i.e., excluding any mention of TRP).

Regarding SRSP-522, RABC proposes a light re-wording to clarify Section 1.1:

This Standard Radio System Plan (SRSP) sets out the minimum technical requirements for the efficient use of the frequency band 27.5-28.35 GHz for non-competitive local licensed systems and applies to **flexible use broadband systems (that is, both fixed and mobile systems)**, ~~including flexible use broadband systems~~, operating in the band.

Regarding SRSP-522, Section 6.1.4, as the equipment ecosystem for indoor systems is not mature at this time, RABC recommends that ISED revisit the low-power operating requirements.

Finally, at the request of the Department, RABC posted the draft standards on its website to facilitate comments from Canada's World Trade Organization (WTO) partners. A total of eleven comments were received on our WTO portal and forwarded to the Department for consideration.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'J.D. Farnes', with a stylized flourish at the end.

J. David Farnes
General Manager