

December 10, 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: RSS-195, draft issue 3, *Wireless Communication Service Equipment Operating in the Bands 2305-2320 MHz and 2345-2360 MHz*; and SRSP-516, draft issue 2, *Technical Requirements for Wireless Communications Services (WCS) in the Bands 2305-2320 MHz and 2345-2360 MHz*

Dear Josette Gallant,

In September 2025, the Department requested that RABC review new draft issues of RSS-195, *Wireless Communication Service Equipment Operating in the Bands 2305-2320 MHz and 2345-2360 MHz*; and SPSP-516, *Technical Requirements for Wireless Communications Services (WCS) in the Bands 2305-2320 MHz and 2345-2360 MHz*. The Board assigned the review of the standard to the Advanced Wireless Services Subcommittee. The Subcommittee held two meetings to review the proposed changes to the standard.

During the review, proposed changes to the draft SRSP-516 were received from the aviation sector (which includes NAV CANADA and Transport Canada Civil Aviation). TCCA and NAV CANADA raised a concern regarding whether the 5 km distance trigger for coordination between WCS and non-GOC AMT systems is appropriate, noting that a value of 45 km currently applies to similar systems under FCC regulations. Upon review of the proposals, the subcommittee determined that further technical analysis would be required to justify whether or not some or all of the proposals are necessary. The Board requested, and the Department granted, a one-week extension to the filing date. The Department established a new firm deadline of December 10, 2025, for the submission of comments.

RABC has been advised by TCCA and NAV CANADA that due to the unavailability of updated technical data on aeronautical mobile telemetry (AMT) systems operating in the 2360–2400 MHz band in Canada, the WCS / Non-GoC AMT compatibility analysis being prepared jointly by TCCA and NC will not be finalized by December 10, 2025. Once current AMT operational data becomes available, TCCA and NC will finalize the study and submit it directly to ISED.

Given the Department's firm deadline and given no additional concerns were raised regarding either standard, RABC recommends the Department publish the standards as drafted. Once the TCCA and NAV Canada study becomes available, a further review of SRSP-516 may be warranted.

In addition to conducting its own review of the standards, at the request of the Department, RABC posted the draft standard on its website to facilitate comments from Canada's World Trade Organization (WTO) partners. One (1) comment was 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 standards.

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