



March 23, 2026

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(Submitted by email)

**Subject: SRSP-321.2, Draft Issue 1 – *Technical Requirements for the Fixed Line-of-Sight Radio Systems Operating in the Band 21.2–23.6 GHz***

Dear Josette Gallant,

In January 2026, the Department requested that RABC review the first draft issue of SRSP-321.2 – *Technical Requirements for the Fixed Line-of-Sight Radio Systems Operating in the Band 21.2–23.6 GHz*. The Board assigned the review of the standard to the Fixed Wireless Communications Committee. The Committee held four meetings to review the new standard. Below are our general comments and one specific recommendation.

#### Use of Narrow Channels

Members raised no objection to the removal of channel bandwidths less than 10 MHz, noting that existing radio systems licensed as standard prior to the publication of this SRSP may continue to operate as standard. Extension, expansion, or modification of these systems will be considered by Innovation, Science and Economic Development Canada (ISED) on a case-by-case basis. New systems shall conform to the requirements of this standard. As a result, members agree with the Department's proposal.

Television and radio stations use this band for fixed point to point Studio to Transmitter Link systems. These are typically operated using narrow bandwidth channels. The flexibility for broadcasters to use this band, including the expanded spectrum, should not be unnecessarily restricted.

Assignments should be made on a first come, first serve basis.

New narrow band assignments should utilize legacy spectrum where possible. If required, new narrow band assignments could utilize the expanded spectrum using frequencies from the top down. Similarly, wideband assignments could be made using frequencies from the bottom up. These approaches are consistent with the proposed draft SRSP; therefore, no changes are requested.

### Channel Sizes

During discussions, consideration was given to reducing the number of available channel bandwidths to 50 MHz and 100 MHz, rather than retaining the full set of 10, 15, 20, 40, 50, 60, 80 and 100 MHz options, in order to reduce assignment complexity. However, operators using the band objected to this approach, noting that the current fee structure is based on assigned bandwidth rather than actual usage. As such, operators indicated that they require the flexibility to order only the bandwidth necessary to meet their requirements. Also, limiting available channel sizes to 50 MHz and 100 MHz would reduce spectrum efficiency, as an operator requiring, for example, 20 MHz would be required to order a 50 MHz channel, resulting in inefficient spectrum use.

To summarize, Mobile Operators require the flexibility to utilize a range of channel sizes (10, 15, 20, 40, 50, 60, 80 and 100 MHz) to accommodate the needs of their networks and to minimize the cost of spectrum licences by utilizing the smallest channel size to best suit the customer's requirements. As a result, members agree with the Department's proposal; therefore, no changes are requested.

There is a general agreement that in order to future proof the band for technology advancements, 160 MHz and 200 MHz channel sizes should be added to the band in SRSP-321.2. RABC members are observing, at the international level, a constant and growing demand for more capacity in the band. Some applications that will be deployed in the band will enjoy better system gain using one wide channel than two narrow channels combined with a power splitter (a.k.a. coupler). It will be lower cost to use one transceiver with a wide channel than two transceivers plus a power splitter with narrow channels. While the addition of 160 MHz and 200 MHz channel sizes is no different from existing channel sizes in terms of centre frequency alignment (i.e. 160 MHz corresponds to two 80 MHz channels and 200 MHz corresponds to two 100 MHz channels), it was noted that larger channel sizes reduce the total number of available channels in the band. For example, a channel bandwidth of 200 MHz would result in only six available channels. This reduction in channel availability was raised as a concern during discussions.

Having said that, while demand for the larger channels may be low today, RABC does not expect that ISED will review SRSP-321.2 again in the near term. It would be better to include the wider channels in the standard now to future proof the band, recognizing that the Department would not necessarily have to immediately approve applications to use links with the 160 MHz and 200 MHz channels.

### Section 4.9

To keep the language in SRSP-321.2 consistent with the language used in the recent new issue of SRSP-331.8, RABC proposes the following change:

**When point-to-point digital radio systems form a closed loop, such systems shall be designed to consist of an even number of hops to permit the use of two-frequency plans.**

~~Systems must be designed so that any closed loop will consist of an even number of hops.~~

### Section 4.10

RABC agrees with the use of CCDP being both permitted and encouraged by ISED as proposed in the draft standard.

### Section 4.11

ISED proposes increasing the minimum spectral efficiency requirement for digital systems to 2.4 bit/s/Hz on a single polarization in a bandwidth corresponding to the channel spacing. RABC agrees with the proposal to increase the spectral efficiency requirement as proposed.

Conclusion

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. We did not receive any comments via our WTO portal.

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

Sincerely,

A handwritten signature in black ink, appearing to read "J. D. Farnes". The signature is written in a cursive style with a long horizontal flourish extending to the right.

J. David Farnes  
General Manager