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(Submitted by email)

Subject: SRSP-501, Issue 6 (Draft) — *Technical Requirements for Land Mobile and Fixed Radio Services Operating in the Bands 406.1-430 MHz and 450-470 MHz*

Dear Josette Gallant,

Introduction

In July the Department requested that RABC review new draft issue of SRSP-501 — *Technical Requirements for Land Mobile and Fixed Radio Services Operating in the Bands 406.1-430 MHz and 450-470 MHz*. The Board assigned the review of the standard to the Public Safety Subcommittee, a subcommittee of the Mobile and Personal Communications Committee. The subcommittee held one meeting to review the new standard. The Board has the following comments on the draft issue.

Section 2, Paragraph 7

Paragraph 7 includes the sentence “Existing systems licensed as standard prior to the issuance of this SRSP may continue to operate as standard systems.” RABC suggests the sentence be replaced to clarify that existing licensed systems will continue to be grandfathered and will not require modification solely to comply with the requirements introduced under Issue 6 of the SRSP. RABC recommends the following wording: “Existing systems licensed as standard prior to the issuance of this SRSP may continue to operate under their current authorizations and shall not be required to undergo modification solely as a result of new technical, geographic separation, or co-channel protection requirements introduced under this SRSP.”

Geographic Separation and Co-Channel Methodology

The last sentence in paragraph 7 states “New systems and expansion or replacement of existing systems using band allocations that differ from the standard allocations defined within this SRSP may be authorized as standard assignments on a case-by-case basis; however, this is at the discretion of the local ISED office and additional justification may be required.” Paragraph 67 explains how the geographic separation between co-channel base stations will be calculated. RABC believes the SRSP should clarify that the proposed geographic separation and co-channel protection methodology will apply primarily to new assignments, major modifications, and future expansion projects, and not to existing authorized

facilities. RABC recommends the following sentence be added to Section 2: “The geographic separation and co-channel protection methodology described in Section 7.3 shall apply to new assignments, major modifications, and expansion proposals. Existing authorized systems shall not be subject to re-evaluation or modification solely as a result of the implementation of this methodology.”

Section 5, Paragraph 28

Paragraph 28 currently states that channels in the 406.1-406.2 MHz band may be assigned after all other channel assignments have been considered and, in general, where no other channels are available in a given area. We suggest reconsidering this provision.

Resolution 205 (Rev.WRC-19), which is referenced by paragraph 28 and applies in Canada through footnote 5.265 of the Canadian Table of Frequency Allocations, specifically requests administrations not to make new frequency assignments in the 406.1-406.2 MHz band under the mobile and fixed services.

Accordingly, allowing a new assignment in this band solely because no alternative channel is available would appear inconsistent with the approach established in Resolution 205. Allowing assignment in the frequencies immediately adjacent to the 406-406.1 MHz distress and safety band is not compatible with the protection objective. RABC recommends that in this mixed-use environment, protection be prioritized over more dense assignments.

This is particularly important because Resolution 205 recognizes the potential for emissions from fixed and mobile stations operating in adjacent spectrum to affect reception by the Cospas-Sarsat system, including the detection and timely reception of 406 MHz distress beacon transmissions.

RABC therefore recommends that paragraph 28 be aligned more directly with the protection objective and the specific request set out in Resolution 205.

Proposed replacement text for paragraph 28

28. The frequency band 406-406.1 MHz is allocated to the mobile-satellite service (Earth-to-space) for distress and safety applications. In accordance with Resolution 205 (Rev.WRC-19), which applies pursuant to footnote 5.265 of the Canadian Table of Frequency Allocations, new frequency assignments to stations in the mobile and fixed services shall not be made in the frequency band 406.1-406.2 MHz.

Additional technical consideration - 406.1-410 MHz

Since SRSP-501 covers fixed and mobile systems operating above 406.1 MHz, we also suggest that ISSED consider whether the document should include an explicit reference to the control of unwanted emissions from systems operating in the 406.1-410 MHz range. Resolution 205 urges administrations to take all practical steps to limit unwanted emissions from stations in this range so as not to cause harmful interference to MSS systems operating in 406-406.1 MHz.

For this broader protection consideration, Recommendation ITU-R M.1478-3 could be referenced as the applicable source of protection criteria for Cospas-Sarsat satellite receiving instruments. We would view this as complementary to, rather than a replacement for, the specific restriction on new fixed and mobile assignments in 406.1-406.2 MHz.

Duplex Block B (414-415 MHz / 419-420 MHz)

RABC is concerned that future secondary mobile assignments in Duplex Block B (414-415 MHz / 419-420 MHz) could constrain the operation, modification, relocation, or expansion of existing primary fixed-link systems and requests clarification regarding the measures that will be implemented to prevent such

constraints. Paragraph 44 includes the following sentence: “For duplex Block B, the sub-band 414-415 MHz paired with 419-420 MHz is allocated on a primary basis to fixed systems. Mobile radio services may be assigned on a secondary basis...” Paragraph 53 includes “Fixed links will be assigned on a primary basis in the sub-bands 414-415 MHz and 419-420 MHz...” RABC recommends the following addition to the SRSP: “Mobile radio assignments authorized on a secondary basis within Duplex Block B shall not constrain the operation, modification, relocation, modernization, expansion, or future licensing of primary fixed-link systems. The primary status of fixed systems shall take precedence in all licensing and coordination activities.”

Through operational and spectrum-management experience, the RCMP feels it is important that sufficient spectrum access remain available to support the future growth and deployment of primary fixed-link systems in the 414-415 MHz and 419-420 MHz bands. The RCMP requests clarification on how future secondary mobile applications will be assessed to support this objective. The following sentence is proposed for addition to Section 7.3, paragraph 72: “In evaluating applications for secondary mobile assignments within Duplex Block B (414-415 MHz paired with 419-420 MHz), ISED will ensure that sufficient spectrum resources remain available to support current and future primary fixed-link requirements, including network growth, modernization, and deployment of new facilities.”

The RCMP believes that primary fixed-link requirements should continue to receive priority access to spectrum in accordance with the established allocation framework. The RCMP is concerned that existing secondary mobile assignments could limit future primary fixed-link deployments and requests clarification on how priority access will be maintained in such circumstances. The following sentence is proposed for addition to Section 5.4, paragraph 53: “Secondary mobile assignments operating within Duplex Block B shall continue to operate on a no-interference, no-protection basis and shall not prejudice, delay, constrain, or otherwise limit current or future primary fixed-link assignments. Future primary fixed-link requirements shall retain priority access to the spectrum consistent with the primary allocation framework established by this SRSP”.

Future Consideration

Electricity Canada supports the proposed revisions to SRSP-501. As a future consideration, outside the scope of the current consultation, ISED may wish to examine opportunities to better accommodate private broadband applications through channel arrangements aligned with 3GPP Band 87 or a new band plan based on the existing 409-410 MHz / 420-421 MHz Mobile Radio Service allocation. Such a review could improve alignment with emerging critical infrastructure IoT requirements while preserving incumbent operations.

Conclusion

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

Sincerely,



J. David Farnes
General Manager