RADIO ADVISORY BOARD OF CANADA
CONSEIL CONSULTATIF CANADIEN DE LA RADIO

February 16, 2018

Director, Spectrum Regulatory Best Practices
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5

Submitted by email: ic.spectrumauctions-encheresduspectre.ic@canada.ca

Re: SLPB-006-17: Consultation on the Spectrum Outlook 2018 to 2022

The Board is pleased to respond to the above noted consultation. The attached response was developed by a Joint Working Group comprised of members of all four of the RABC Standing Committees, under the leadership of the Chair of the RABC Fixed Wireless Committee. The consultation had broad interest amongst RABC members, with approximately sixty stakeholder participants actively involved in developing the response.

This response was sent to RABC Sponsor Members for ballot. Sixteen of the RABC's twenty-one Sponsor Members responded as follows: 13 approved (APCO, CAB, CACP, CanWISP, CBC/Radio-Canada, CEA, CSSIF, MAAC, National Defence, Ontario, Railway Association of Canada, Rogers and TELUS), 2 approved with comment (Bell and CECA) and 1 abstained (RCMP).

The Sponsor Members' comments (which form an integral part of the RABC's response) are as follows:

Bell

Re: RABC Response to Question 5 – Paragraph 19 While we generally support the Board's comments, we take exception to the RABC's views regarding dynamic spectrum access sharing and in particular the statement, "We believe this technology shows great possibility…". While it is true that dynamic spectrum access sharing may have some utility in limited amounts of prescribed spectrum (i.e., similar to Wi-Fi bands), it is uncertain whether use of these techniques, outside of the multi-operator core network sharing approach, could support the requirements of future high reliability public broadband services.

Re: RABC Response to Question 10 – Paragraph 44 With respect to the Board's statement in paragraph 44: "Therefore, demand for C-band FSS is expected to remain relatively constant over the next five years.", we are of the view that these comments are not consistent with both the Northern Sky Research (NSR) Global Satellite Supply and Demand Study, 13th Edition and the CRTC's 2014 Satellite Inquiry Report referenced by the Department in the consultation. In both

cases, the general view is that C – Band spectrum is currently underutilized and the trend is that its usage will decrease slightly over the next five years. In view of these trends, we continue to support the Department's proposal to consider how C-band can be used in the future for other services.

CECA

CECA is generally supportive of the response in the section on Question 20. However, we cannot support the second sentence in paragraph 79, "that commercial mobile narrowband systems (due to a restrictive channelization standard) became less relevant with the availability of robust mobile broadband over the last decade". It is our strong opinion that it is more accurate to state "that commercial mobile narrowband systems while remaining critical to public safety and Public Land Mobile Radio System (PLMRS) services, have been supplanted in some applications, with the availability of robust mobile broadband over the last decade".

In addition, CECA believes that footnote 28 would be clearer to the reader with the addition of the bracket as follows: "[28] Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-based 800 MHz Specialized Mobile Radio Licensees, FCC 12-55, May 24, 2012 (see footnote 1 regarding allocations)."

The RABC and its members appreciate the opportunity to provide input on this important issue.

Sincerely,

J. D Farnes

J. David Farnes
General Manager

Attachment