

February 20, 2018

Ms. Magdoly Rondón  
Spectrum Engineer,  
Engineering, Planning and Standards Branch  
Innovation, Science and Economic Development Canada  
235 Queen Street, 6<sup>th</sup> Floor  
Ottawa, ON, K1A 0H5  
(Submitted by email)

Dear Ms. Rondón,

**Re: SRSP 371.0**

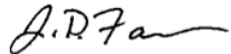
On January 3, 2018, the Department requested feedback from RABC related to SRSP-371.0. Specifically, the RABC was asked to comment on issues related to potential revision of the current channelling band. The Department's request was sent to members of the Board's Fixed Wireless Communications Committee and the Chair of the Committee has reviewed the responses provided by members. We offer the following comments:

- There is support to fully align with channel plan in latest version ECC recommendation (05)07 (Lugano 2013), in order for operators to provide cost effective services to Canadians from available global ecosystem, which is also reflected in ITU Recommendation F.2006.
- There is also support for review of SRSP-371.0 as soon as convenient to the Department to avoid any under optimal use of this important band for fixed services operators.
- RABC also would like to highlight that the smaller channel of 500 MHz in ECC recommendation is not unused, but can be used for smaller channels, paired or unpaired, similar to the other channels (please see the notes under Figure A4.2 of the ECC recommendation mentioned above).
- RABC recommends maintaining 250 MHz as the default minimum RF channel size in SRSP-371.0, which is consistent with the ECC recommendation. RABC believes this band is well suited for wide-bandwidth applications supporting high throughput communications. We believe using RF channels narrower than 250 MHz as the default minimum RF channel size, may lead to spectrum fragmentation in the future thus preventing operators from using larger channels (such as 1 GHz or 2 GHz). Larger RF channels may be required in some areas to serve ever growing bandwidth capacity users' needs.
- That being said, in order to provide flexibility to support applications requiring less bandwidth, RABC is of the view that ISED may consider allowing RF channel sizes smaller than 250 MHz, so long as the channels are a subset of 250 MHz (125 or 62.5 MHz as mentioned in ECC recommendation). It would be important to limit the number of allowed 250 MHz RF channels for such use, in order to minimize impact to operators wishing to use larger RF

channels as mentioned above. At this point, RABC does not have a specific recommendation concerning an appropriate limit. The Board would be pleased to discuss the issue further, if the Department sees an interest in considering such use of the E-Band.

RABC appreciate the opportunity to provide input on the SRSP-371.0, which is seen as important to provide large transport capacity in urban areas for telecommunications services to Canadians.

Sincerely,

A handwritten signature in cursive script, appearing to read "J.D. Farnes".

J. David Farnes  
General Manager