

December 4, 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-312.7 - Technical Requirements for Radio Systems Operating in the Fixed Service, in the Band 12.7-13.25 GHz, Issue 2

Working with the Department, the RABC Fixed Wireless Communications Committee established the 13 GHz band as a priority for the alleviation of fixed service congestion in the 11 GHz and 15 GHz bands. The Board appreciates receiving a draft revision of SRSP-312.7 *Technical Requirements for Radio Systems Operating in the Fixed Service, in the Band 12.7-13.25 GHz, Issue 2*, sent on April 26, 2017. Moreover the Board appreciates the Department's support as we developed the recommendations contained herein.

RABC established a working group of its fixed service and broadcasting members to develop recommendations that would allow the coexistence between the multiple services allocated to the 13 GHz band. RABC held nine meetings to develop the following recommendations proposed to the department:

- Use the ETSI standard with three (3) RF channels to take advantage of a larger more cost-effective ecosystem and consider the addition of a fourth (4th) RF channel in the future, as it is RABC understanding that remaining TV pick-up licensees will stop using this band in the near future
- Use ETSI class 3 with antenna gain of 35 dBi as the mask for revised envelope B (outside moderately congested or highly congested areas)
  - This is shown as dotted green line in the attachment, which would allow use of ultra-high-performance antennas and some high-performance two-foot antennas, adding flexibility in deployment
- Use ETSI class 3 with antenna gain of 41.5 dBi as the mask for the revised envelope A (within moderately congested or highly congested areas), with a requirement that deployed antenna has a minimal gain of 40 dBi

- This is shown as dotted blue line in the attachment, which would allow use of four-foot and even some three-foot antenna having good characteristics in congested areas, providing added flexibility in deployment, mainly for building top cases
- Use ETSI class 3 with antenna gain of 50 dBi as the mask for a new envelope for VHCM point-to-point link, where at least one end is within moderately congested or highly congested areas
  - This is shown as dotted red line in the attachment, where ten-foot and some eight-foot antenna can be used
  - This is important to optimize use of the bands as VHCM links typically requires the entire frequency band
- For VHCM links where both ends are outside moderately congested or highly congested areas, it is recommended to use the above-mentioned envelope A (dotted green line in the attachment) with a requirement that deployed antenna has a minimal gain of 47 dBi
  - This would allow deployment of less restrictive antennas (some eight foot antenna without XPD) outside congested areas, further optimizing use of this band

RABC appreciates the opportunity to provide input on the SRSP-312.7, which is seen as important for the continuous long-term use of fixed services for telecommunications services to Canadians. The Board remains available to respond to questions regarding these recommendations.

Sincerely,



J. David Farnes  
General Manager

cc: Ali Akbari, ISED  
Adoule Rasno, ISED

Attachment