



January 19, 2021

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(Submitted by email: ic.spectrumengineering-genieduspectre.ic@canada.ca)

Re: Canada Gazette Notice No. SMSE-014-20 - Consultation on the Technical and Policy Framework for Licence-Exempt Use in the 6 GHz Band

The Radio Advisory Board of Canada (RABC or the Board) is pleased to respond to the above noted consultation. The attached response was developed by a special working group of the Board. The consultation has broad interest amongst RABC members, with approximately forty stakeholder participants actively involved in developing the response.

The response was sent to RABC Sponsor Members for ballot. All twenty of the Board's Sponsor Members voted. The breakdown of the votes is as follows: **11 approved** (American Home Appliance Manufacturers, Canadian Association of Wireless Internet Service Providers, CBC/Radio Canada, Canadian Electricity Association, Canadian Electronics Communications Association, Canadian Satellite and Space Industry Form, Model Aeronautics Association of Canada, National Defence, Radio Amateurs of Canada, Railway Association of Canada and TELUS; **5 approved with comment** (see below); and **4 abstained** (Canadian Association of Broadcast Consultants, Canadian Association of Broadcasters, Canadian Wireless Telecommunications Association and NAV CANADA).

The Sponsor Member's comments (which form an integral part of the RABC response), are as follows.

Bell

- *Paragraph 17 – Under the first bullet point, we do not believe that referring to “similar characteristics” is the appropriate term. The intent is to draw a comparison between the 3.5/3.8 GHz band and the 6 GHz band indicating that they share some of the same characteristics.*

- *Paragraph 48 Question 8 a) – Given that Contention Based Protocols (CBP) are not able to protect fixed service receivers, outdoor operation of very low power devices, Bell recommends that in the absence of Automated Frequency Coordination (AFC) outdoor operation should not be permitted.*

Canadian Association of Chiefs of Police

It should be noted that consideration and concern was expressed by public-safety incumbents of this band and that their concerns acknowledged, and considered by RABC as part of the process.

They have been documented in the response under 12. C) of the response.

Province of Ontario

ISED should be aware of the recent petition for the appeal of the 6 GHz FCC RLAN rules by APCO, EEI, AT&T and others. Due to the timing of the announcement, the RABC response did not have the opportunity to include this information.

RCMP

It is quite clear that significant and quality work have gone into the preparation of this document.

While the RCMP does not make use of the 6 GHz band, there are concerns about the aggregate interference for other Public Safety (PS) agencies (namely Ontario) and the potential for real impact(s) to satellite operators.

Many ideas have been documented and proposed to the future architecture of the Automated Frequency Control (AFC). The RCMP has concerns and would like to emphasize a conservative approach going forward to ensure continued interference free operations for existing incumbents. As an example, Public Safety frequency information could be excluded in the AFC. As a result, microwave links frequencies would not show up in the AFC data base and prevent the assignment of those frequencies in specifically identified regions.

Rogers Communications

Concerning ISED's question 4(e) related to a vertical elevation mask, with a maximum e.i.r.p. of 125 mW at elevation angles above 30 degrees over the horizon, Rogers generally recommends against requirements for Canadian-specific devices that may lead to higher costs for Canadians. The vast majority of Canadians are within a few hundred kilometres of the U.S. border where the 30 degree elevation mask is required, and there is no real justification for using a different elevation mask for the relatively small number of Canadian standard-power installations that could potentially contribute to an aggregation of interference. A better way of protecting satellite uplink receivers, if found necessary by the Department, would be to develop specific conditions of operation for

standard-power RLAN devices in the extreme east and west and Far North areas of the country, where potential victim satellites may appear below 30 degrees in elevation.

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

Sincerely,



J. David Farnes
General Manager

Attachment