

June 10, 2021

Ms. Josette Gallant
Senior Director, Terrestrial Engineering and Standards
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5
(Submitted by email)

**Re: RSS-222, issue 3, February 2021 (Draft)–*White Space Devices (WSDs)* and
DBS-01, issue 3, February 2021 (Draft)–*White Space Database Specifications***

Dear Ms. Gallant,

In February 2021, the Department requested the RABC review proposed updates to Radio Standard Specifications, RSS-222, issue 3, February 2021 (Draft) – *White Space Devices (WSDs)*; and White Space Database Specification, DBS-01, issue 3, February 2021 (Draft) – *White Space Database Specifications*. The Department also requested the consultation be posted to the RABC website in order to facilitate the receipt of comments from WTO members.

The Board created a special working group to undertake the review of the standards. The working group held one call to review the initial draft of the procedure document. There were roughly thirty stakeholders participating in the review, including guest participation from four stakeholders at the request of the Department.

During the initial review, RABC members indicated support of the Department's direction to generally harmonize the standard with the standards in the US. Feedback was also provided that certain differences still remain between the draft Canadian standards and the approved standards in the US. These differences could limit the availability of white space devices in the Canadian market, if manufacturers must produce products unique to the Canadian regulations, rather than taking advantage of the ecosystem created by the US regulations. Members and guest participants provided feedback during the review call and some subsequently provided feedback in writing.

Following its initial review, the Board also received three comments for each standard via the WTO Portal on its website. These comments were forwarded to the Department for consideration.

Having considered the comments from RABC members as well as the comments submitted via the WTO Portal, the Department issue revised drafts (dated May 2021) for final comment. The RABC working group has reviewed the revised drafts and offers the following comments.

There are two main discrepancies between the revised draft Canadian standard RSS-222 and the US standard that RABC recommends be harmonized.

The first discrepancy is that FCC only requires certification testing at the maximum power level. In the original draft, the Department required testing at each power level; and it has now reduced the requirement to just the maximum and minimum power level (in section 11.3 of RSS-222). While an improvement, this is still a material additional test requirement compared to FCC and may result in reduced useable range of power levels available to a WSD in Canada (vs the US).

The second discrepancy is the ACLR requirement in section 11.7.1 of RSS-222. In the initial draft, there was one paragraph that stated that "the band edge and adjacent channel power levels of WSDs shall not exceed the limits established in table 4 and table 5 during any time of transmission". There was also another paragraph that stated, "band edge and adjacent channel levels shall comply with the less stringent applicable limit prescribed in Table 4." While the second statement reflects the actual FCC requirement, it conflicts with the first statement. In the updated draft, the first paragraph remains and the second was deleted. The combined impact of these changes is to create a requirement that is now very clearly different and more stringent than FCC's requirement.

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

Sincerely,



J. David Farnes
General Manager