



October 15, 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 spectrumengineering-genieduspectre@ised-isde.gc.ca)

Subject: Addendum Consultation on Amendments to SRSP-520, *Technical Requirements for Fixed and/or Mobile Systems, Including Flexible Use Broadband Systems, in the Band 3450-3650 MHz*

Dear Ms. Gallant,

1. On August 6, 2021, the Department initiated a very short 15-day technical consultation on proposed amendments to Standard Radio System Plan SRSP-520, *Technical Requirements for Fixed and/or Mobile Systems, Including Flexible Use Broadband Systems, in the Band 3450-3650 MHz*. On August 12, 2021, the RABC requested that the Department extend the filing date to October 21, 2021, to allow the RABC and its members to provide a meaningful response to the consultation. On August 12, 2021, ISED denied the request of the RABC. The Board submitted comments regarding the proposed amendments on August 23, 2021.
2. On September 22, 2021, the Department published an Addendum Consultation on Amendments to SRSP-520, *Technical Requirements for Fixed and/or Mobile Systems, Including Flexible Use Broadband Systems, in the Band 3450-3650 MHz*. The Addendum Consultation included an extension to the comment period to the original consultation.
3. Since RABC submitted comments pursuant to the deadline established in the original consultation, we will not be submitting additional comments at this time. The Addendum Consultation has not allowed sufficient time for the Board to examine the new information released by the Department and provide meaningful comments.

4. As explained in our original comments, the RABC intends to initiate a working group to study the coexistence issues between 5G 3.5/3.8 GHz systems and Aeronautical Radio Altimeters as a way forward to help resolve the many questions surrounding these issues.

Sincerely,



J. David Farnes
General Manager