

December 9, 1998

Consultation on 24 GHz and 38 GHz  
Radiocommunications and Broadcasting Regulatory Branch  
Industry Canada  
Room 1559D – Jean Edmonds Tower North  
300 Slater Street  
Ottawa, ON K1A 0C8

**Re: Comments in Response to the Consultation on the 24 GHz and 38 GHz**

Dear Sir:

The Canadian Broadcasting Corporation (CBC) is pleased to have the opportunity afforded by the Gazette Notice DGRB-003-98 to submit its views. The CBC would like to address Sections 3.1.1 and 3.2 of the “Consultation on the 24 and 38 GHz Frequency Bands: Proposed Policy and Licensing Procedures.”

The CBC opposes the proposed amendment of the Canadian Table of Frequency Allocations to include a primary allocation for the Fixed Service in the 25.05 – 25.25 GHz band, as well as the proposed amendment to Footnote C44, for the following reasons:

- This sub-band is part of the WARC-92 (24.75 – 25.25 GHz) allocation to provide 500 MHz of spectrum for Feeder-Links to the BSS stations operating in the 17.3 – 17.8 GHz band;
- The proposal would remove 200 MHz of protected spectrum for these feeder-links, which would add significant constraints and seriously jeopardize the use of this band. For obvious reasons, the whole 500 MHz is required for the feeder-links;
- Because of Footnote C44 (existing or MOD), the 24.75 – 25.25 GHz band is the only band available in Canada for Feeder-Links to the BSS stations operating in 17.3 – 17.8 GHz band;
- Since WARC-92, BSS developments have increased internationally, in North America as well as in Canada. The use of the 17.3 – 17.8 GHz is closer than it has ever been.
- Although specific sharing analyses have not been done, it is likely that it will be very difficult to share within the same geographical area these feeder-link earth stations and fixed service systems.

Although the CBC understands the reasons for this proposal, i.e. the requirement for spectrum for wireless broadband services and the harmonization with the U.S., the CBC is of the opinion that it would not be in the overall interest of the Canadian public to proceed with this proposal. The full 24.75 – 25.25 GHz band will eventually be required in Canada for Feeder-Links to the BSS stations operating in the 17.3 – 17.8 GHz band. This possibility

should be fully protected. Considerable studies, discussions and representations were done prior and during WARC-92 to arrive at this allocation, including within CPC-WARC 92.

The CBC urges the Department to carry out sharing studies and explore other options before proceeding with these amendments.

The CBC appreciates the opportunity afforded by this Gazette Notice to comment on this issue.

Yours sincerely,

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