



June 14, 2009

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Industry Canada
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Subject: Canada Gazette, Part I, March 14, 2009, Consultation on Transition to Broadband Radio Service (BRS) in the Band 2500-2690 MHz, Notice DGRB-005-09

Intel Corp. (Intel) hereby submits the following comment in response to the Consultation on Transition to Broadband Radio Service (BRS) in the Band 2500-2690 MHz. Intel is the world's largest semiconductor manufacturer and a leader in technical innovation. Intel is also a leading manufacturer of communications and networking chips and equipment.

Intel applauds Industry Canada for their efforts to provide maximum flexibility to operators during the transition to BRS. We believe these efforts will benefit Canadian consumers. Answers to the questions in the consultation are provided on the following pages.

The Department is seeking comments on its proposal to adopt a firm transition date to BRS rather than renew MCS and MDS licenses.

Should a firm transition to BRS be adopted, the Department is proposing March 31, 2011, as the transition date to BRS, as it coincides with the end of license term for the current MCS licenses.

Intel supports a firm transition date to Broadband Radio Service (BRS) rather than a renewal of MCS and MDS licenses at the end of the current license term in 2011.

We concur with Industry Canada's proposal of March 31, 2011 as the transition date. Since the current MCS licenses are due to expire on March 31, 2011 and licensees have already had several years to utilize the voluntary conversion process, Intel believes this is the most appropriate time to transition to BRS licenses.

The Department seeks comments on the options that should be applied to the Manitoba school boards and the commercial MCS licensee:

- Option 1 – Eligible for conversion to BRS;
- Option 2 – Subject to a transition
- Option 3 – Grandfathered

Intel recommends that the commercial MCS licensee be eligible for conversion to BRS.

Industry Canada invites comments on which component(s) (i.e. CRTC Decision, Industry Canada broadcasting certificate, and CRTC license) should be required for licensed MDS in order to qualify for conversion to BRS in a given area.

Should MDS stations that do not meet the eligibility criteria be protected through a transition policy (notification period prior to displacement) in the event that a firm transition date to BRS is adopted?

Intel has no comment on this issue.

Comments are also sought on whether CRTC license-exempt systems that serve small, rural and remote communities having small populations should be treated differently from the CRTC-licensed systems.

Should these undertakings not be eligible for conversion and a firm transition date to BRS is adopted, the Department seeks comments on what would constitute a suitable notification period for these stations to retune to available frequencies or cease operating. Notification would be given only if the MDS station would prevent the deployment of a BRS system.

The Department notes that given the low power and rural location of these systems, it is unlikely that their existence will hinder future deployment of BRS. Therefore, Intel recommends that the CRTC license-exempt systems be allowed to continue provided they do not impact the deployment of a licensed BRS system. If a CRTC license-exempt system impacts the deployment of a licensed BRS system in the future, the license-exempt system would need to retune to available frequencies or cease operation.

Industry Canada seeks comments on whether Tier 3 or Tier 4 license areas are the most appropriate for the conversion of site-specific MCS licenses to BRS spectrum licenses, where applicable, and for conversion of MDS authorizations, including Industry Canada spectrum licenses issued in the 2596-2690 MHz band.

Intel recommends that Tier 3 license areas are the most appropriate for the conversion of site-specific MCS licenses and MDS authorizations to BRS licenses. National licenses or large regional licenses which can be easily aggregated facilitate the deployment of large scale, high-mobility systems.

Industry Canada seeks comments on these license conditions proposed for voluntarily converted BRS licenses.

Intel has no comment on the proposed license conditions for voluntarily converted BRS licenses.

Comments on Stakeholder Proposal Development on a new band plan for BRS

Intel would like to provide comments on the information provided in section 8 of the consultation, entitled “Stakeholder Proposal Development on a Band Plan for BRS”.

- 1) The amount of spectrum available to an operator has an important impact on the viability of the business model of the operator. For example, the WiMAX Forum suggests a minimum of 30 MHz per operator.
- 2) We note that in the United States band plan, incumbents have the flexibility to deploy Time Division Duplex (TDD) or Frequency Division Duplex (FDD) anywhere in the band. Utilization of this band plan could facilitate roaming within North America.