



Reply Comments on

Canada Gazette Notice No. DGRB-005-09

**Consultation on Transition to Broadband Radio Service (BRS)
in the Band 2500-2690 MHz**

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The Wireless Communications Association International (“WCAI”), the trade association of the wireless broadband industry, submits these reply comments on the Consultation released by Industry Canada on March 14, 2009. WCAI previously participated in this proceeding with comments filed on June 15, 2009. In those Comments, WCAI urged Industry Canada to: allocate the spectrum in contiguous spectrum blocks of at least 30 MHz each; to permit fully flexible use of the spectrum for either TDD or FDD throughout the entire band and allow operators to mitigate any potential interference; and to harmonize to the maximum extent possible its band plan with the band plan in the United States and other countries. WCAI believes that adoption of a band plan and rules in accordance with these recommendations would promote the rapid and efficient deployment of mobile broadband services in Canada and minimize cross-border interference with the United States.

WCAI is filing these reply comments in response to other parties that have urged Industry Canada to adopt rules and a band plan that would favor certain technologies over others, which would in turn make band plan harmonization between Canada and the United States incredibly difficult and lead to substantial cross border interference issues. In these reply comments, WCAI emphasizes that to achieve full flexible use of this spectrum, to simplify necessary cross-border coordination between Canada and the United States, and to allow wireless operators on both sides of the border to thrive and bring innovative solutions to the marketplace, Industry Canada should adopt rules and a spectrum plan that do not favor one technology over another. In particular, Industry Canada’s plan should be

based upon spectrum blocks large enough to be useful for different types of technology. To that end, WCAI supports the comments filed by Intel Corporation, the WiMAX Forum and Craig Wireless and opposes those comments urging Industry Canada to adopt rules and a spectrum plan that favor LTE and/or HSPA at the expense of WiMAX and other new technologies.

DISCUSSION

I. Industry Canada should allocate the spectrum in contiguous spectrum blocks of at least 30 MHz each to meet increasing consumer demand for mobile broadband services.

As WCAI indicated previously, it urges Industry Canada license the 2.5 GHz spectrum in contiguous spectrum blocks of at least 30 MHz each. Contiguous spectrum blocks of greater than 30 MHz would permit operators to launch services using whatever technology the public desires and give operators the flexibility to adapt to customer needs. Providing for more contiguous spectrum would allow faster data rates and more flexible frequency reuse schemes, and would enhance coordination efforts with U.S. operators. Channel sizes of less than 10 MHz would significantly reduce the spectral efficiency of mobile broadband networks. More commenters supported adoption of at least 30 MHz spectrum blocks than supported any smaller size block. See Comments Filed by Intel Corporation; Manitoba School Divisions; WiMAX Forum. Blocks of spectrum less than 30 MHz would automatically discriminate against certain technologies, as would adoption of only paired spectrum blocks of less than 30 MHz.

II. Industry Canada should permit full flexible use of the spectrum for either TDD or FDD throughout the entire band and allow operators to mitigate any potential interference.

Contrary to some of the commenters, WCAI believes that the best way to maximize efficient use of the 2.5 GHz spectrum band is to provide for fully flexible use of the spectrum for either TDD or FDD throughout the entire band and allow operators to mitigate any potential interference. WCAI urges Industry Canada to adopt rules and a spectrum plan that does not favor one technology over another. This would allow licensees and systems operators to freely switch between FDD and TDD technologies as technology changes and marketplace demands evolve. In contrast, limiting by rule the use of a portion of the band to FDD and a portion of the band to TDD, or restricting the spectrum band to only paired use could stymie investment and deployment of advanced technologies (4G and beyond) in the band.

III. Industry Canada should harmonize to the maximum extent possible its band plan with the band plan in the United States and other countries.

As WCAI indicated previously, it is of paramount importance to operators on both sides of the boarder that the band plans of both countries are in harmony. The U.S. band plan currently allows full flexible use within the band, i.e., operators may choose either FDD or TDD. In addition, other countries have adopted a similar approach to the band, which will enable manufacturers and network operators to realize economies of scope and scale and will facilitate cross-border roaming. In addition, WCAI is concerned that significant deviation from the U.S. band plan, i.e., by limiting the Canadian allocation to FDD use in the upper and lower portions of the band or by allocating a significant portion of the band to paired spectrum, would give rise to serious cross border coordination and interference issues that may

make it impossible for parties on both sides of the border to deploy new mobile broadband services in the 2.5 GHz band.

CONCLUSION

WCAI appreciates this opportunity to share its views with Industry Canada and looks forward to working with Industry Canada in the future.

Respectfully submitted,
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