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Dawn Hunt
Vice-President
Regulatory - Telecom

June 29, 2007

Director, Spectrum and Radio Policy
Telecommunications Policy Branch
Industry Canada
300 Slater Street, Room 1604A
Ottawa, Ontario K1A 0C8

Sent via email: wireless@ic.gc.ca

Dear Mr. St. Aubin:

**RE: *Canada Gazette*, Part I, Saturday, March 31, 2007, Consultation on
Proposed Spectrum Utilization Policy, Technical and Licensing
Requirements to Introduce Dedicated Short-range Communications-based
Intelligent Transportation Systems Applications in the Band 5850-5925 MHz
- DGTP-003-07**

Rogers Communications Inc. (Rogers) appreciates the opportunity to provide comments on the above-noted consultation.

Documents are being sent in Adobe PDF Version 5.0. Operating System: Microsoft Windows XP.

Regards,

A handwritten signature in black ink, appearing to be "Dawn Hunt", written in a cursive style.

Dawn Hunt
DH/gt

Department of Industry

Proposed Spectrum Utilization Policy, Technical
and Licensing Requirements
to Introduce Dedicated Short-range
Communications-based Intelligent Transportation
Systems Applications in the Band 5850-5925 MHz

DGTP-003-07

COMMENTS OF
ROGERS COMMUNICATIONS INC.

June 29, 2007

EXECUTIVE SUMMARY

1. Rogers Communications Inc. (“Rogers”) is pleased to submit the following comments in response to the public consultation initiated by the Department of Industry (“the Department”) published in the *Canada Gazette*, dated March 23, 2007, entitled ‘**Notice No. DGTP-003-07 – Proposed Spectrum Utilization Policy, Technical and Licensing Requirements to Introduce Dedicated Short-range Communications-based Intelligent Transportation Systems Applications in the Band 5850-5925 MHz**’ (“the Consultation Paper”).
2. In the Consultation Paper, the Department has invited public comments on proposals to introduce Dedicated Short-range Communications (DSRC) in support of Intelligent Transportation Systems (ITS) in the band 5850-5925 MHz.
3. Rogers Communications Inc. (“Rogers”) is a leading Canadian communications services provider which, among other things, serves over 6 million wireless subscribers via an extensive wireless network that covers approximately 94% of the Canadian population. This vast coverage area is, in part, made possible by Rogers’s use of hundreds of fixed services digital microwave transport links operating in the 5.9 GHz band.
4. Given the nascent nature of DSRC ITS systems, Rogers believes that it is premature and not necessary to require the wholesale displacement of incumbent fixed service licensees from this band. Instead, the Department should provide for frequency coordination and sharing between incumbent licensees and DSRC ITS proponents. Incumbent systems should only be displaced as required, on a “case-by-case” basis.
5. Rogers believes that co-sharing studies between incumbent fixed services systems and DSRC ITS systems should be completed so that frequency coordination and sharing between these systems can be implemented and to minimize the extent to which incumbent systems will be displaced.
6. Rogers recommends that the Department set aside channels 176 and 182 as Canadian Special License zones to restrict the use of these channels in certain geographical areas where incumbent systems are operating. Rogers does not support adoption of the US designations for exclusive uses on channel 172 and 184.
7. Rogers supports a spectrum licensing approach for DSRC ITS, since it will facilitate the coordination between incumbent systems and new DSRC ITS.
8. Rogers supports the licensing of DSRC ITS for Road-Side Units (RSUs) and On-Board Units (OBUs) on a geographical area basis.

DETAILED COMMENTS

Background

9. In the Consultation Paper, the Department seeks comments on proposals associated with the introduction of new DSRC-based ITS applications in the band 5850-5925 MHz.
10. The Consultation Paper states in paragraph 4.2 that, “[p]resently, there are approximately 500 fixed systems in the band 5850-5925 MHz, predominantly used to support major cellular route expansion in the adjacent bands.” Given that Rogers operates approximately 500 fixed service systems within this band, Rogers is a key stakeholder in the issues under consideration in the Consultation Paper.

Treatment of Incumbent Services (Consultation Paragraph 4.2)

11. Rogers currently makes extensive use of this band as a cost-effective means of transporting voice and data associated with the advanced mobile voice and broadband Internet and multimedia services that Rogers provides throughout Canada and, specifically, in rural and remote areas. At the time of the initial implementation of Rogers’ systems using the 5.9 GHz band, there were no suitable alternative bands below 3 GHz available for deployment of these low-capacity systems. Rogers consulted the Department regarding the deployment in this band for Rogers’ low-capacity digital microwave systems and subsequently constructed these systems using the 5.9 GHz band, on the understanding that this band would be retained for this purpose going forward. Once the department allocated low capacity spectrum in the adjacent L6 GHz band located between 5.925 and 6.425 GHz, Rogers stopped deploying new systems within the 5.9 GHz band and instead used the L6 GHz band for new systems. As a result, Rogers has implemented and currently operates approximately 500 systems within the 5.9 GHz band that were built prior to the new L6 GHz assignments being available.
12. The provision of Rogers advanced telecommunications services in all regions of Canada and, specifically, in rural and remote areas is consistent with the federal government’s telecommunications policy objectives. Moreover, the continued operation of Rogers’ 5.9 GHz digital microwave systems that are used to provide these services is clearly in the public interest.
13. Rogers notes that it will incur significant capital costs if its systems are displaced from this band by DSRC ITS. Given these significant potential costs, Rogers fully supports the Department’s proposed transition policy which provides that the displacement of incumbent systems in the 5.9 GHz band will occur only when

and where absolutely required to accommodate DSRC ITS.

14. Rogers is not aware of any co-sharing studies between the incumbent systems and DSRC ITS. Rogers recommends that the Department undertake a co-sharing study so that a formal procedure for domestic and cross-border spectrum coordination between DSRC ITS and incumbent systems can be developed. The purpose of such a procedure would be to ensure that incumbent systems will be displaced only when displacement will be required to accommodate DSRC ITS.
15. Rogers strongly believes that DSRC ITS proponents must be required to determine whether unacceptable interference will occur and that incumbent systems will need to be replaced, on a case-by-case basis.

Band Plan (Consultation Paragraph 4.3)

16. As noted above, Rogers has approximately 450 fixed service systems with frequency assignments that fall within the proposed 10 MHz DSRC ITS service channels 176 and 182. In order to avoid premature and unnecessary displacements of incumbent systems, Rogers recommends that the Department set aside and designate channels 176 and 182 as Canadian Special License zones and to restrict use of these channels in certain geographical areas where incumbent systems are operating. In light of this, Rogers requests that the Department provide for non-exclusive 10 MHz assignments for channels 172, 174, 180, 184, and assign channels 176 and 182 for DSRC ITS only if all other channels have been fully utilized.
17. In light of the above, Rogers does not support adoption of the US designations for exclusive uses on channel 172 and 184. Adoption of the US designations would limit the choice of the service channel selections for other DSRC ITS applications and it would cause the premature and unnecessary displacement of incumbent systems.

Radio Authorization (Consultation Paragraph 7.3.1)

18. Rogers supports the use of a spectrum licensing approach for DSRC ITS. Spectrum licensing would facilitate the coordination between incumbent systems and DSRC ITS. It would also reduce the administrative burden on the Department and the affected parties.

Licensing OBUs and RSUs (Consultation Paragraph 7.4)

19. Rogers supports the licensing of DSRC ITS for RSUs and OBUs on a geographical area basis. DSRC ITS licensees should be required to register site-based RSUs within their licensed area, and should be required to coordinate with incumbent system licensees prior to the implementation of their DSRC ITS

applications.

20. Rogers recommends that Industry Canada develop and maintain a database of DSRC registered RSUs, with relevant site information, and make it available for licensees to access and use for frequency co-ordination studies.

CONCLUSIONS

21. Rogers has significant amount of digital microwave systems that operate in the 5850-5925 MHz band. These systems are used by Rogers to provide advanced wireless voice and broadband internet and multimedia services to Canadians living and traveling in rural and remote areas.
22. Given the low level of maturity of and demand for DSRC ITS, it would be premature and unnecessary to require the wholesale displacement of incumbent systems from this band. Incumbent systems should only be displaced as required to accommodate DSRC ITS, on a case-by-case basis.
23. The Department should provide for the coordination and sharing of frequencies within this band by incumbent licensees and DSRC ITS licensees. To facilitate coordination and sharing, the Department should complete co-sharing studies.
24. Rogers recommends that the Department set aside and designate channels 176 and 182 as Canadian Special License zones and to restrict the use of these channels in certain geographical areas where incumbent systems are operating. Rogers does not support adoption of the US designations for exclusive uses on channel 172 and 184.
25. Rogers supports a spectrum licensing approach for DSRC applications, since this approach would facilitate coordination between incumbent systems and new DSRC ITS systems.
26. Rogers supports the licensing of DSRC ITS for RSUs and OBUs on a geographical area basis.
27. Rogers appreciates the opportunity to provide comments on the policy and technical proposals for the 5.9 GHz band.

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