



2010 03 12

To: Ms. Pamela Miller
Director General
Telecommunications Policy Branch
Industry Canada
300 Slater Street
Ottawa, Ontario
K1A 0C8.

Subject: **Consultation on the Spectrum Allocations and Spectrum Utilization Policies for the Frequency Range 1435-1525 MHz (L-Band), as published in the Canada Gazette, Part 1, dated 19 December 2009, Notice No. DGTP-010-09**

Dear Ms. Miller,

1. Bell Canada (Bell or the Company) is pleased to submit the following brief comments in response to Notice No. DGTP-010-09, *Consultation on the Spectrum Allocations and Spectrum Utilization Policies for the Frequency Range 1435-1525 MHz (L-Band)*, as published in the Canada Gazette, Part 1, dated 19 December 2009 (the Consultation). Bell notes that it also participated in the Radio Advisory Board of Canada (RABC) discussions regarding the Consultation and that it is in agreement with the positions adopted in the RABC's submission in this regard. In this submission, however, Bell would like to focus on issues specific to it and, more particularly, to a number of its subscribers.

2. In this regard, Bell notes that it currently has approximately 7,050 customers in Ontario and Québec utilizing Subscriber Radio Systems (SRS) as their only means of telephony provision in their homes. Moreover, Bell submits that these subscribers would be affected as a result of the proposed changes, i.e., continued operation on a no interference, no protection basis, subsequent to the proposed 5-year transition period. Approximately, 2,196 of these subscribers are within 320 km of the Downsview airport while approximately 436 are within 320 km of Mirabel airport. As a result, these subscribers would be immediately affected by the introduction of Aeronautical Mobile Telemetry (AMT) within the airspace of these airports once the above change is implemented.

3. Further, at the present time Bell is not aware of any alternative technology that could be economically or feasibly deployed as a replacement for these systems, either now or within the proposed 5-year transition timeframe. Consequently, Bell proposes and would support a test of the 1492–1525 MHz band to determine if the band can feasibly be shared by SRS with AMT. In this regard, Bell submits that a full technical plan must be prepared by the parties wishing to employ AMT in the band. Bell further submits such a test plan must be representative of the actual situations under which AMT will be permitted, by Industry Canada, to operate should the

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proposed changes be implemented. Bell suggests, in this regard, that a 3-month review period be established to enable acceptance of the test plan, by both Industry Canada and Bell, prior to the actual commencement of testing in the field. If AMT's use in the range 1492–1525 MHz is limited to 25 MHz for testing and operation, then Bell will take this factor into consideration, during the proposed 3-month review period, to identify and determine any potential impacts on our systems and subscribers.

4. Given SRS incumbency in the band and the significant number of customers potentially affected and/or disrupted by this test, Bell submits that it is reasonable that it be provided with a right to sign-off prior to any changes being implemented. If during the 3-month review period it can be demonstrated that there is significant potential for Bell systems and subscribers to be adversely impacted, then further testing should not be permitted to take place. Moreover, if testing is in fact allowed to proceed and harmful interference does occur, then the testing should cease immediately.

5. With respect to the possibility of re-tuning Bell's impacted systems using 49 and 66.5 MHz transmit/receive (TX/RX) spacing, Bell is not in a position to commit to move to other TX/RX spacing as a viable option at this time. Our understanding, in this regard, is that it would be extremely challenging to re-tune our existing SR500 equipment to any other TX/RX spacing plan from both a firmware (i.e. TX/RX spacing) and hardware (e.g. filtering, old crystal card) perspective. Bell's analysis suggests that significant development work and costs are likely to be involved, in any such change, and we cannot commit to this without the opportunity to fully review the test plan, actual test results and to conduct the necessary subsequent analysis to determine the actual re-tuning related costs.

6. In closing, Bell Canada would appreciate the opportunity to review the test results with AMT proponents and Industry Canada to determine if there is a suitable way forward, on this issue, which does not adversely impact the service provided to several thousand customers. In this regard, Bell notes that it is prepared to work with the Department to avoid any adverse impact to these subscribers.

Yours truly,

[Original signed by D. Woodford]

Donald Woodford

Director – Government & Regulatory Affairs

DW/lp

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