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Innovation Science and Economic Development Canada
Senior Director, Spectrum Licensing and Auction Operations
235 Queen Street (6th Floor, East Tower)
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Submission via email: ic.spectrumbauctions-encheresduspectre.ic@canada.ca

Re: Consultation on a Policy and Licensing Framework for Spectrum in the 3500 MHz Band, SLPB 002-19

To: Senior Director, Spectrum Licensing and Auction Operations:

Motorola Solutions (MSI) submits these comments with respect to Innovation, Science and Economic Development (ISED) Canada's Consultation on a Policy and Licensing Framework for Spectrum in the 3500 MHz Band (SLPB-002-19).¹

Question 2 of the Consultation seeks comments on its proposal to use Tier 4 service areas for the 3500 MHz licensing process:

There is an ever increasing need for localized private broadband networks to serve critical infrastructure, industrial, business, and other specialized users. These private networks provide specific security, privacy, capacity, coverage, latency, local control/management and related capabilities apart from commercial networks. While Tier 4 service areas may suffice for 3.5 GHz commercial flexible use services, smaller service areas (such as the recently defined Tier 5 service areas²) are generally better suited for localized private broadband networks. MSI supports an approach where 3.5 GHz Tier 4 licensees would be able to accommodate through leasing or other arrangements small private broadband networks with localized mobile use in addition to commercial flexible use mobile and fixed services wide area deployments.

Question 14 of the Consultation seeks comments on its proposed deployment condition of licence as well as its proposed levels of deployment:

MSI advocates the consideration of deployed private broadband networks for specialized users in addition to commercial flexible use mobile and fixed services deployments for all 3.5 GHz Tier 4 licensees. Such consideration would provide further incentives to 3.5 GHz Tier 4 licensees to consider and enable deployment of localized private broadband networks. MSI therefore recommends that the number of specialized users served by the Tier 4 licensee would additionally be included by the licensee to meet the general deployment minimum population coverage requirement numbers³.

¹ Published in the Canada Gazette, Part 1, Volume 153, Number 25 (June 22, 2019).

² Decision on a New Set of Service Areas for Spectrum Licensing (DGSO-006-19) defining smaller Tier 5 service areas.

³ Consultation on a Policy and Licensing Framework for Spectrum in the 3500 MHz Band (SLPB-002-19) at Annex F and Annex H10.

Question 15 of the Consultation seeks comments on the proposed conditions of license outlined in annex H that would apply to flexible use licenses:

Private broadband network for specialized users that are deployed by a 3.5 GHz Tier 4 licensee and do not provide public telephone network inter-connectivity and therefore should not be considered as a telecommunication common carrier service for any purpose under Annex H.

In summary, MSI believes that these approaches will better serve the Canadian population, by improving the productivity and efficiency of critical infrastructure, industrial, business, and other specialized user operations.

Respectfully Submitted,

/s/ Frank Korinek

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