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To: Ms. Reema Hafez
Director
Space Services Planning
Innovation, Science and Economic Development Canada
235 Queen Street
Ottawa, Ontario K1A 0H5

Via email: ic.spectrumengineering-genieduspectre.ic@canada.ca

Subject: **SMSE-016-18 - Consultation on the Utilization of the Bands 18.8-19.3 GHz and 28.6-29.1 GHz, and the Bands 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz by the Fixed-Satellite Service - Comments**

Dear Ms. Hafez,

1. In accordance with the procedure set out by Innovation, Science and Economic Development Canada (the Department) in Notice No. SMSE-016-18, *Consultation on the Utilization of the Bands 18.8-19.3 GHz and 28.6-29.1 GHz, and the Bands 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz by the Fixed-Satellite Service* (the Consultation), dated 25 October 2018, we are pleased to provide our Comments on this Consultation.
2. The Consultation focuses on two key issues:
 - a. New spectrum utilization policies on the use of the 18.8-19.3 GHz and 28.6-29.1 GHz bands by the Fixed-satellite services (FSS) and on subsequent changes to licensing in the bands; and
 - b. Changes to the spectrum utilization policy for the use of the frequency bands 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz by the FSS.
3. We concur with the Department's views, as noted in the Consultation¹, that next-generation geostationary orbit (GSO) satellites and non-geostationary orbit (NGSO) satellites are expected to continue to play an important role in enabling connectivity and bridging the digital divide between rural and urban areas of the country. Both GSO and NGSO satellite constellations offer the potential to deliver high-speed internet connectivity and innovative services and applications for all Canadians. This is particularly the case for those systems that are currently using the Ka spectrum bands or planning to do so.

¹ SMSE-016-18, paragraphs 6 and 7.

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4. We therefore believe that it is appropriate for the Department to provide regulatory certainty to both existing and future satellite (GSO and NGSO) system licensees through the establishment of a new spectrum utilization policy.
5. While we do not address the first four questions in the Consultation, as these are more appropriately answered by existing satellite system operators, we offer the following comments with respect to Questions 5 and 6.

18.8-19.3 GHz and 28.6-29.1 GHz Bands

Question 5: ISED is seeking comments on the proposed changes to the Canadian Table of Frequency Allocations (CTFA). In providing responses, include supporting arguments for or against the proposed changes.

6. The CTFA currently assigns a Primary allocation for both FSS and Fixed Services (FS) in the bands 18.8–19.3 GHz as well as 28.6–29.1 GHz. Since 2005 however, Canada has also identified the above bands in Footnote 5.516B² of the Radio Regulations for high-density FSS deployments. The Department proposes to revise the status of FS systems operating in these bands to "secondary". This approach seems reasonable as licensed FS systems have been operating in the 18.8-19.3 GHz band since 2014, on a no-interference basis with respect to FSS and there have been no requests from FSS licenses to displace FS stations to date. This indicates that interference has not been an issue in the past. We understand, that the proliferation of FS systems in order to meet the ongoing demand for mobile and fixed broadband services in rural and remote areas of Canada may be a concern in the future and that the Department is seeking to ensure that future deployment of FSS systems in these same areas are not unduly constrained by the FS systems.
7. Given the above, we do not object to the Department's proposal to change the FS allocation designation from primary to secondary status in the CTFA for both the 18.8-19.3 GHz and 28.6-29.1 GHz bands.

Changes to the spectrum utilization policy for the use of the bands 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz

Question 6: ISED is seeking comments on the above proposed changes to the CTFA. In providing responses, include supporting arguments for or against the proposed changes.

8. We understand that the Department received a request³ from an existing satellite operator seeking to change the current Canadian FNs associated with the 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz bands in order to facilitate the operation of gateway earth station facilities for the FSS. The Department is seeking comments on proposals to modify some of the existing spectrum utilization policies for the 17.3-17.7 GHz, 19.3-19.7 GHz and 29.1-29.25 GHz bands and to review certain (FNs) limiting the use by the FSS to feeder links for other services.
9. We have no objections to the Department's proposals to modify the Canadian FNs, which currently limit the use of the above noted spectrum bands by FSS services to feeder links for other services. We also do not object to the Department's proposal to allow FSS systems to use the 17.3-17.7 GHz band in the earth-to-space direction subject to the condition set out in paragraph 64 of the Consultation, that these stations operate on a "no-harmful interference, no-

² SMSE-016-18, paragraph 47.

³ SMSE-016-18, paragraph 52.

protection" basis in relation to systems operating in accordance with the RR, such as our BSS uplink stations.

10. Further, the proposed modification must also be conditional on FSS systems (space-to-earth) operating in the 17.3-17.7 GHz band not causing any more interference, or requiring any more protection from interference, than the BSS services that are currently operating in the band and in conformance with the RR.

11. Should you have any question or require further clarification, please do not hesitate to contact me.

Yours truly,

[Original signed by M. MacInnis]

Michael MacInnis
Vice President - Regulatory Affairs

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