



2018 02 15

To: Mr. Martin Proulx  
Director General  
Engineering, Planning and Standards Branch  
Spectrum, Information Technologies and Telecommunications Sector,  
Innovation, Science and Economic Development Canada  
235 Queen Street, 6<sup>th</sup> Floor  
Ottawa, ON, K1A 0H5

Via email: [ic.spectrumengineering-genieduspectre.ic@canada.ca](mailto:ic.spectrumengineering-genieduspectre.ic@canada.ca)

Subject: **SMSE-018-17: Consultation on the Technical and Policy Framework for White Space Devices (WSDs) – Comments**

Dear Mr. Proulx,

1. Bell Mobility would like to thank the Department for the opportunity to provide comments on the above-noted consultation.
2. We believe that it is important for the Department to develop and implement appropriate technical, policy and licensing frameworks to ensure that Canadian consumers, businesses and public institutions benefit from the use of wireless devices for a variety of products and services.
3. We actively participated in the development of the comments submitted to the Department by the Radio Advisory Board of Canada (RABC) on this consultation. While we generally support those comments, we take exception to the RABC's view that dynamic spectrum access sharing "will be a valuable new tool for spectrum management in the future". While it is true that whitespace dynamic spectrum access sharing may have some utility in limited amounts of prescribed spectrum (i.e., similar to Wi-Fi bands), it is uncertain whether use of these techniques, outside of the multi-operator core network sharing approach, could support the requirements of future high reliability public broadband services.
4. With respect to the RABC's response to Question 3 regarding limiting the use of WSDs to spectrum below 608 MHz, we note that there was no consensus reached on the proposal. We support the comments in favour of restricting the use of WSDs to spectrum below 608 MHz and to allow broadcasters to continue to use wireless microphones in the spectrum above 608 MHz until such time as it is required for mobile services.
5. Should you have any questions please do not hesitate to contact me.

Yours truly,

*[ Original signed by M. MacInnis ]*

**Michael MacInnis**  
Vice President - Regulatory Affairs

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Bell Canada  
**Michael MacInnis**  
Floor 19  
160 Elgin Street  
Ottawa, Ontario K2P 2C4

**Telephone: (613) 781-7224**  
Facsimile: (613) 560-0472  
[bell.regulatory@bell.ca](mailto:bell.regulatory@bell.ca)