

# Lenbrook Corp.

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Senior Director, Spectrum Planning and Engineering  
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Submitted by email: [ic.spectrumengineering-genieduspectre.ic@canada.ca](mailto:ic.spectrumengineering-genieduspectre.ic@canada.ca)

## **Re: SMSE-018-17 – Consultation on the Technical and Policy Framework for White Space Devices**

Lenbrook thanks the Department for the opportunity to comment on this consultation as we believe that White Space is an innovative technology that promises to bring a number of new wireless applications and opportunities that will benefit Canadians.

The use of White Space Device technology also represents a major step forward in the use of dynamic spectrum access sharing techniques, which is likely to become an ever increasingly important method of managing spectrum in the future.

Lenbrook notes that while White Space technology has been successfully used in the US for well over 5 years now, it has been very disappointing that Canadians have been denied the ability to utilize White Space technology in Canada until now. Now that a White Space Database provider has finally been certified, we believe Canada should proceed to permit full commercial utilization of the technology just as soon as possible.

Generally speaking, Lenbrook supports maximizing harmonization with the US except in instances where there exists a real and genuine reason not to do so. This approach has served Canada well in the past and has led to many of benefits for Canada, including the ability for Canadians to access to a wider variety of equipment and solutions and on a more economically favourable basis than would otherwise be the case. Further, this also provides broader market opportunities and potential scale for Canadian companies to innovate, develop and produce technology for major ecosystems.

In the case of White Space Devices, Lenbrook believes there is no valid reason that would justify a Technical and Policy Framework for White Space Devices in Canada that deviates materially, if at all, from the U.S.

The reader will find this fundamental position reflected below in our responses to the Questions asked in the Consultation paper.



**The Lenbrook Group of Companies**

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**Q1. ISED is seeking comments on its proposal to harmonize with the U.S. framework regarding the operation of fixed white space devices in the channels 3 and 4 (60-72 MHz).**

Lenbrook supports ISED's proposal to harmonize with the U.S. and permit the operation of fixed WSDs in channels 3 and 4 (60-72 MHz).

**Q2. ISED is seeking comments on its proposal to harmonize with the U.S. framework regarding the operation of personal/portable white space devices in channels 14 to 20 (470-512 MHz).**

Lenbrook supports ISED's proposal to harmonize with the U.S. and permit the operation of personal/portable WSDs in channels 14 to 20 (470-512 MHz).

**Q3. ISED is seeking comments regarding its proposal to limit the use of white space devices to spectrum below 608 MHz at this time.**

Lenbrook notes that ISED's proposal to limit WSDs from operation above 608 MHz represents a material deviation from the US, which allows the use of WSDs in almost all of the spectrum between 614 and 698 MHz.

Lenbrook notes that the ISED proposal would restrict WSDs from the ability to access as much as 79 MHz of spectrum, and would constitute a very significant impediment to the successful utilization and development of WSD in Canada.

Lenbrook therefore opposes the ISED proposal and submits that ISED should fully harmonize with the US and permit operation of WSDs above 608 MHz on similar, if not identical, terms.

ISED's stated rationale for its proposal is that the availability of spectrum below 608 MHz will be more stable in terms of spectrum for use by WSDs, since the DTV transition plan and schedule have already been published.

However, Lenbrook notes that lack of stability in spectrum availability is essentially irrelevant given the inherent dynamic spectrum access capability of WSDs. Operations of other radiocommunications systems in the spectrum above 608 MHz will be fully protected from interference from WSDs, just as such operations in the spectrum below 608 MHz will be, because access to spectrum is fully controlled by the White Space Database.

Therefore there is no substantive reason to impose such a significant restriction on White Space technology.

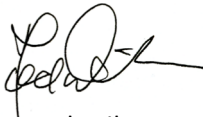
Indeed, one would have expected the Department to strongly encourage and even provide incentives to utilize such an innovative new technology.

**Q4. ISED is seeking comments on its proposal to continue to preclude the use of channel 37 (608-614 MHz) by white space devices.**

The Board supports ISED's proposal to continue to preclude the use of channel 37 (608-614 MHz) by WSDs.

Lenbrook trusts that the Department will find these comments helpful, and see fit to more fully harmonize with the US.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Wiles", with a horizontal line extending to the right.

Ted Wiles  
Vice President & General Manager