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Regarding: SMSE-019-17 - Consultation on the Technical, Policy and Licensing Framework for Wireless Microphones¹

Lectrosonics, Inc. is pleased to respond to the above captioned consultation. Lectrosonics is a manufacturer of professional wireless microphone systems certified and marketed in the United States and Canada.

Q1. ISED is seeking comments on its proposal to allow wireless microphones to use the 3 MHz guard band (614-617 MHz) and the 11 MHz duplex gap (652-663 MHz) subject to appropriate conditions to mitigate adjacent channel interference to mobile services.

- A. Should technical rules be harmonized with those of the FCC to allow low power wireless microphones in the guard band (614-617 MHz) and duplex gap (653-663 MHz) with a maximum transmit e.i.r.p. of 20 mW?

Lectrosonics supports the harmonization of technical rules with those of the FCC to simplify the design, manufacture and deployment of wireless microphone systems in the US and Canada.

Q2. ISED is seeking comments on its proposal to introduce the use of wireless microphones, on a secondary basis, into the frequency bands 941.5-952 MHz, 953-960 MHz, 6930-6955 MHz and 7100-7125 MHz with appropriate conditions to prevent interference to fixed services.

Lectrosonics supports the proposal to allow the use of wireless microphones on a secondary basis into the 941.5-952 MHz and 953-960 MHz bands. These allocations are harmonious with the 900 MHz band wireless microphone operations permitted by FCC Part 74 rules. These allocations will provide badly needed spectrum for wireless microphone operations. Because Lectrosonics already manufactures equipment that operates in these bands, the needs of the market in Canada can be met relatively quickly.

Economies of scale allowed by aligning the technical rules for this band with those in the United States will help lower the cost of new equipment. In particular, Lectrosonics proposes that the RF power limit specification for transmitters in these bands be aligned with the power specification in the FCC Part 74 rules². We propose that the limit be 250 mW conducted power,

¹ Canada Gazette Part I, Vol. 151, No. 47, Notice No. SMSE-019-17, Nov. 25, 2017

² 47 C.F.R. § 74.861(d)(1).

not the 250 mW EIRP limit found in RSS-210 Annex G today (for TV Band devices). This will allow the same equipment to be sold in both the US and Canada, and afford licensed, professional users the system design flexibility they need.

Q3. ISED is seeking comments on its proposal to allow wireless microphones to access the broadcasting bands (54-72 MHz, 76-88 MHz, 174-216 MHz, 470-608 MHz), the duplex gap (652-663 MHz) and the guard band (614-617 MHz) on a licence-exempt basis, and the voluntary licensing of eligible users' wireless microphones.

A. ISED is seeking comments on the eligibility criteria to determine who should be permitted to voluntarily license their systems (see paragraph 62).

Lectrosonics supports the availability of voluntary licensing for wireless microphone operation in the TV broadcasting bands. This confers the ability for users to register their operations in the white space database to gain protection from white space device operations. This protection will be needed more than ever after the move of TV stations in the 600 MHz band down into the remainder of the TV broadcast band. We also support the proposal to change the eligibility criteria to professional users only. This aligns the policy with the current FCC rules governing wireless microphone operations and gives professional users the certainty they need.

Q4. ISED is seeking comments on its proposal to license the operations of wireless microphones on a secondary basis in the frequency bands 941.5-952 MHz and 953-960 MHz, 6930-6955 MHz and 7100-7125 MHz, based on its eligibility criteria.

A. ISED is also seeking comments on the eligibility criteria (see paragraph 62).

Lectrosonics has no objection to limiting the use of these bands to licensed operations only. We agree that this will facilitate the frequency coordination needed to minimize the potential for conflict with incumbent services.

Respectfully submitted,

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11 February 2018