

February 15, 2018

Senior Director  
Spectrum Planning and Engineering  
Engineering, Planning and Standards Branch  
Innovation, Science Economic Development Canada  
235 Queen Street  
Ottawa, Ontario K1A 0H5

**Re: SMSE-019-17 – Consultation on the Technical, Policy and Licensing Framework for Wireless Microphones**

Dear Sir/Madam:

NAV CANADA Communication Navigation and Surveillance (CNS) Engineering has reviewed your invitation to Consultation on the Technical, Policy and Licensing Framework for Wireless Microphones, SMSE-019-17, published in November 2017, and is pleased to provide the following comments:

- 1) NAV CANADA fully supports ISED's current position of not making the frequency band 960-1164 MHz available for the operations of wireless microphones at this time, as stated in paragraph 52, section 8.1.4.
- 2) As Canada's Air Navigation Services Provider, we operate a number of systems supporting safety critical air traffic control services that operate in this frequency band; these include navigation and surveillance systems such as DME, SSR, ADS-B and MLAT. Given the nature of civil aviation, the operation of these systems is harmonized on a global basis and conforms to the applicable Standards and Recommended Practices (SARPs) of the International Civil Aviation Organization (ICAO). The operation and performance of these systems, including safety management processes, are regularly audited by Transport Canada.
- 3) There are other military and civilian users of this band which makes it congested. These systems are designed and operated to be compatible with the same aviation safety requirements.
- 4) NAV CANADA is, and will be in the future, opposed to opening this band to commercial, non-safety terrestrial applications, unless all regulatory, compliance enforcement, safety, legal and liability issues are fully understood, defined and applied equally to potential new users as they are to civil aviation users.

Thank you for the opportunity to state our position on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "William Estrada". The signature is fluid and cursive, with the first name "William" and the last name "Estrada" clearly distinguishable.

William Estrada, P.Eng.  
Director, CNS Engineering

c.c. M. Jevtovic, NAV CANADA