

February 13, 2018

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

Introduction

The Board is pleased to respond to the above noted consultation. The response was developed by a Joint Working Group comprised of members of all four of the RABC Standing Committees, under the leadership of the Chair of the RABC Mobile & Personal Communications Committee. The consultation had broad interest amongst RABC members, with approximately twenty stakeholder participants actively involved in developing the response.

The RABC agrees that the use of wireless microphones (“WMs”) benefits Canadians in a variety of ways and should be supported.

Response to Questions

The Board responds below to the questions outlined in the Consultation.

**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?**
- B. Should a 1 MHz frequency separation be adopted for wireless microphones around the mobile service downlink spectrum (617-653 MHz) to protect mobile service operations?**

A. The Board supports the Department’s proposal to harmonize the technical rules with those of the FCC to allow low power WMs in the guard band (614-617 MHz) and duplex gap (653-663 MHz) with a maximum transmit e.i.r.p. of 20 mW.

B. The Board supports the Department’s proposal that a 1 MHz frequency separation be adopted for WMs around the mobile service downlink spectrum (617-653 MHz) to protect mobile service operations.

**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.**

The Board is of the understanding that secondary use by WMs in these bands would only be permitted on a licensed basis.

Based on that understanding, the Board supports ISED’s proposal to introduce the use of WMs, 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.

**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).**

**B. Should ISED consider a licence-exempt approach for wireless microphones within the broadcasting or 600 MHz bands (614-617 MHz and 652-663 MHz)?**

A. The Board supports the Department’s proposal regarding the eligibility criteria to determine who should be permitted to voluntarily license their systems.

ISED clarified that “professional” would include broadcasters, large venue operators and users, motion picture producers & sounds companies, etc., but would exclude “houses of worship”. ISED wishes to maintain flexibility and will consider whether further guidelines may be useful.

B. The Board recommends that the Department should permit licence exempt and voluntary licensing of WMs in any and all spectrum where both WMs and White Space Devices (“WSDs”) are allowed to operate.

However, the RABC was unable to reach consensus regarding usage of the 600 MHz Guard Band (614-617 MHz) and Duplex Gap (652-663 MHz). There were essentially two positions, one position taken by the broadcasters and supported by the mobile service providers, and the other position taken by the rest of the participants including CanWISP, CECA and the WSD manufacturers. These positions are provided below.

Position of the Broadcasters (supported by the Mobile Service Providers)

The broadcasters support the Department's proposal to designate the 600 MHz bands (614-617 MHz and 652-663 MHz) exclusively for the use of WMs. Broadcasters are in favour of restricting WSDs from these sub-bands so that a licence exempt approach can be used. It is expected that these sub-bands will be utilized for news gathering purposes where deployment will occur on a moment's notice and registration of the location in the WSD database will be highly impractical.

Further, the broadcasters recommend that the maximum possible notice period should be given to vacate WMs from any portions of the 600 MHz Band to prolong the use of existing narrow band WM equipment. This would require the Department to modify the current conditions in SAB-003-17 [Low-power Radiocommunication Devices, Including Wireless Microphones, in the Band 614-698 MHz](#).

Position of the Remaining Participants  
(including CanWISP, CECA and WSD manufacturers)

The reader is referred to the position of these parties as outlined more fully in the RABC response to Question 3 of the parallel Consultation on the Technical and Policy Framework for WSDs.

These members note that harmonization with the U.S. does provide exclusive access for WMs to the 653-657 MHz portion of the Duplex Gap and believe that more than adequately addresses the broadcasters' concerns without the need to limit access to the rest of the bands by WSDs.

**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).**

- A. The Board supports ISED's proposal regarding the eligibility criteria to determine who should be permitted to voluntarily license their systems. The Board expects that by restricting the eligibility criteria to professional users only, accurate interference calculations will be made thereby preventing interference with STL/TSL systems in use by broadcasters.

### Conclusion

This response was sent to RABC Sponsor Members for ballot. Twelve of the RABC's twenty-one Sponsor Members responded as follows: 10 approved (APCO, Bell, CanWISP, CBC/Radio-Canada, CECA, CSSIF, National Defence, MAAC, NAV Canada and Rogers), 1 approved with comment (CAB), and 1 abstained (RCMP).

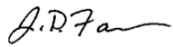
The Sponsor Members' comments (which form an integral part of the RABC's response) are as follows:

#### Canadian Association of Broadcasters

*This consultation is closely related to the potential outcomes of SMSE-018-17 – Consultation on the Technical and Policy Framework for White Space Devices. Additional comments from the CAB in regard to both of these consultations are provided in direct submissions to the Department. The Board appreciates the opportunity to respond to this important notice.*

We appreciate the opportunity to submit comments in response to this consultation.

Sincerely,



J. David Farnes  
General Manager