

20 January 2020

Mr. Martin Proulx  
Director General,  
Engineering Planning and Standards Branch  
Innovation, Science and Economic Development Canada (ISED)  
235 Queen Street  
Ottawa, Ontario K1A 0H5

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

**Re: Notice of Application Received from Globalstar Canada Satellite Co. for  
Ancillary Terrestrial Component (ATC) Authority in the 2.4 GHz Band  
(2483.5- 2500 MHz) – Cogeco Reply Comments**

---

In accordance with the procedures set out in the above-noted consultation, please find attached the reply comments of Cogeco Communications Inc. (“Cogeco”).

Cogeco thanks ISED for the opportunity to submit reply comments in this proceeding and remain available to answer any questions you may have regarding this submission.

Yours very truly,

Leonard D. Eichel  
Senior Director, Regulatory Affairs, Telecommunications

c.c.: Nathalie Dorval, VP Regulatory Affairs and Copyright, Cogeco Inc.  
Marie Ginette Lepage, VP, Wireless Services & Innovation

1. Cogeco Communications Inc. (“Cogeco”) is pleased to submit these reply comments in accordance with the procedures set out by Innovation, Science and Economic Development Canada (ISED) in *Notice of Application Received from Globalstar Canada Satellite Co. for Ancillary Terrestrial Component (ATC) Authority in the 2.4 GHz Band (2483.5- 2500 MHz)* published December 20, 2019 (the “Consultation Document”).
2. Cogeco is a diversified communications company headquartered in Montreal, Quebec, that provides video, broadband and telephony services through its affiliate Cogeco Connexion Inc. to residential and business customers as well as offering third party Internet access and transport services to Internet service providers on a wholesale basis in Ontario and Quebec.
3. As ISED is aware, Cogeco has 30 Broadband Radio Spectrum (BRS) licenses in the 2.5 GHz band. As such, Globalstar’s application has a direct bearing on Cogeco’s ability to exploit this spectrum in the future, particularly in certain markets in Ontario.
4. Of particular concern to Cogeco is the issue of interference mitigation in light of Globalstar’s proposal to utilize the entire portion (16.5 MHz) of its 2.4 GHz MSS spectrum for the provision of ACT services.
5. In this respect, Cogeco notes Globalstar’s commitments with regard to the issue of interference mitigation, in particular:
  - a. The use of a Network Operating System (NOS) to be available 24 hours a day, 7 days a week to holders of spectrum in adjacent bands;
  - b. A commitment to operate low-power ATC equipment, with proscribed Out-of-band Emission limits;
  - c. Attesting to cease all use of ATC equipment if a spectrum holder in an adjacent band detects harmful levels of interference.
6. In response to Globalstar’s application, a number of parties filed comments to ISED. Cogeco notes in particular the comments filed by Rogers Communications Canada Inc. (Rogers) where they state that, while in general they support ISED’s proposal to allow low-power ATC in a portion of Globalstar’s 2.4 GHz MSS spectrum,

they also submit that, in harmonizing the use of low-power ATC in this band, that similar rules currently approved in the United States ought to be adopted in Canada in this regard. In particular, Rogers recommended the adoption of a 5 MHz guard band in the 2495MHz-2500MHz band to further mitigate against any harmful interference.

7. As stated by Rogers, Globalstar offers no evidence in its application that this should not be adopted and, further, Rogers requests ISED that the Globalstar application be rejected for two specific reasons:

- a. The possibility of exacerbating interference issues, given Globalstar's anticipated use of all 16.5 MHz of its 2.4 GHz spectrum, right up to 2500 MHz;
- b. The fact that the 3GPP standard referred to by Globalstar for Band 53 provides no use cases for the portion of the band from 2495 MHz to 2500 MHz.<sup>1</sup>

8. Cogeco agrees with Rogers' comments in this regard. At a minimum, ISED should only grant authorization to Globalstar to operate low-power ATC service in the 2483.5-2495 MHz portion of the 2.4 GHz band, and not in the 2495-2500 MHz portion of the band, for the reasons cited by Rogers in its comments.

9. In particular, Cogeco also agrees with Rogers' statements related to aligning spectrum bands not only to the United States more fully, but also, aligning with an international ecosystem that Globalstar itself states it wishes to use in Canada. Cogeco submits that taking this step will ensure that Globalstar's use of this portion of the spectrum will provide sufficient protection for both Canadian and US users of BRS spectrum from out-of-band emissions.

10. Cogeco thanks ISED for the opportunity to provide reply comments in this consultation.

\*\*\*End of document\*\*\*

---

<sup>1</sup> Rogers Comments, 20 September 2019, pages 2-3.