



10 September 2010

Senior Director, Spectrum Management Operations

Industry Canada

300 Slater Street

Ottawa, Ontario, K1A 0C8

Subject: Comments to the Canada Gazette, Part I, June 12, 2010 Notice DGSO-001-10 – Decisions on the Transition to Broadband Radio Service (BRS) in the Band 2500-2690 MHz and Consultation on Changes Related to the Band Plan

Intel Corporation is pleased to provide comments to the above-reference consultation. Intel Corporation is the world's largest semiconductor manufacturer and a leader in technical innovation. Intel is also a leading manufacturer of communications and networking chips and equipment.

Sincerely,

/s/ Jayne Stancavage

Jayne Stancavage

Sr. Manager-Spectrum Policy

Intel Corporation

Given the benefits of the internationally harmonized band plan, Industry Canada proposes to adopt the Option 2 model of the band plan for BRS in the band 2500-2690 MHz. The Department seeks comments on its proposal to adopt the Option 2 model and on the following related elements:

1. Should operation of the TDD systems be permitted in the FDD portion of the band plan and, if so, under what conditions?

Intel Corporation supports regulations that would permit operation of TDD systems in paired portions of the band plan. This allows the most flexibility for technological innovation and permits operators to deploy the technology that best suits their customers' needs.

2. Should the guard band blocks 2570-2575 MHz and 2615-2620 MHz be held in reserve by Industry Canada or should they form part of the unpaired block (TDD)?

Intel Corporation believes that the blocks 2570-2575 and 2615-2620 MHz should be allocated to service providers. The rationale is that if they are allocated as guard blocks, the spectrum will not be utilized while if they allocated, they could be utilized to provide some services. For example, CEPT Report 19 provides guidance on allowing the spectrum to be utilized as restricted blocks. Other interference mitigation techniques are also possible. Therefore, Intel supports allowing this spectrum to be auctioned or allocated noting that the cost of the spectrum would be expected to be less than unrestricted blocks.

3. If the guard bands are to be held in reserve, should they be considered for future use by licence-exempt wireless systems?

Intel Corporation believes that the spectrum should be allocated for BRS. As noted above, there are methods such as restricted channels which would allow the spectrum to be utilized.

Please provide comments on any additional technical details related to the band plan which are not addressed above.

Intel Corporation supports flexible technology neutral regulations such as those adopted by the United States Federal Communications Commission as shown in option 1.

Mapping of Incumbents into Option 2 Band Plan

9.1 The Department proposes to mandate the exchange of 20 MHz of the MDS spectrum held by Industry Canada for 20 MHz of the MCS spectrum licensed to the MCS incumbent as indicated in Figure 5. Industry Canada seeks comments on this proposal.

9.2 Industry Canada seeks comments on whether government intervention is required where there are different MCS and MDS incumbents in the same geographic areas.

9.3 The Department seeks comments on the challenges faced by more than one operator in making efficient use of the TDD block. Should Industry Canada rely on market forces or should it develop specific technical rules to facilitate coexistence between two or more operators and alignment with the Option 2 Band Plan?

Intel Corporation believes that Industry Canada should rely on market forces to the greatest extent possible during this process.