



Senior Director  
Spectrum Management Operations  
Industry Canada  
300 Slater Street  
1943B  
Ottawa, Ontario  
K1A 0C8

September 10, 2010

Subject: Comments of Motorola in the Matter of Canada Gazette, Part I, Notice No. DSGO-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

Motorola is pleased that the Government of Canada is moving forward with proposals to ensure continued growth of Broadband Services in Canada and the proposed changes recommended to the 2500-2690 MHz spectrum will provide a strong foundation to new such services being introduced in Canada.

Motorola is provider of both WiMAX and LTE technologies that will be a key driver in the provision of broadband services. Motorola WiMAX OFDM Platform is now connecting millions of people, providing reliable broadband and voice services in demanding markets. Motorola is leading this charge with a portfolio of WiMAX Forum Certified™ devices and access points for 2.3 GHz, 2.5 GHz and 3.5 GHz. Leveraging these latest OFDM platforms, the Motorola LTE portfolio offers a smooth migration for both 3GPP and 3GPP2 operators. Motorola's LTE solution provides operators with a reliable and leading edge end-to-end solution for their next generation mobile broadband networks.

As correctly identified by the Department, significant shifts in both equipment and services have taken place in this band in Canada and internationally since the 2000 World Radiocommunication Conference. While we concur with many of the proposals which better enable licensees to deliver broadband in Canada, we do wish to provide comments on the items below:

- Section 8.2, Question 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)?

*Motorola recommends that the guard band blocks form part of the unpaired block (TDD), as systems deploy the unpaired block licensee may be able to use this block, with agreement of the licensee adjacent to this block. Such an approach will minimize the amount of spectrum which would lie fallow and not be put to use. The use of the guard blocks by another application outside either the paired or unpaired licensees control could result in interference to both licensees and is not recommended.*

- Section 9.3 – Effective use of the unpaired (TDD) Block - The Department seeks comments on the challenges faced by more than one operator in making efficient use of



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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?

*Motorola notes that licensing the unpaired block as a single 50 MHz block would result in a more efficient use of spectrum as techniques required for compatibility with multiple smaller blocks of unpaired spectrum could reduce efficiency, multiple blocks can be accommodated using techniques such as those adopted in the US by the WCS holders for compatibility. In order to provide wider channels (which improves channel efficiency) Motorola recommends that no more than 2 licensees be provided in the TDD block.*

- Section 9.5 – Timing - Industry Canada is seeking comments on the timing aspects related to the physical migration of the existing network facilities to the new band plan, including the timing required for the completion of all transactions regarding spectrum exchanges.

*Motorola support RABC comments on this issue - The RABC recommends that incumbents should only be displaced from their existing spectrum assignments on a “where necessary” basis to permit the implementation of new BRS systems by other licensees. Incumbents should be given a period of 12 months starting from the issuance of a displacement notice by the Department. The Department should issue displacement notices after having reviewed and approved displacement requests from BRS licensees. The RABC notes that this approach would be consistent with the transition policy adopted by the Department for the Personal Communications Services (PCS) band<sup>1</sup> and the Advanced Wireless Services (AWS) band<sup>2</sup>. The RABC also notes that there could be geographical exceptions that would have to be dealt with on a case-by-case basis.*

In conclusion Motorola supports Industry Canada proceeding with changes to the 2.5 GHz band to provide wireless broadband services. If you have further questions please contact the undersigned.

Sincerely,

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Dave Sherman  
Director Field Operations Canada  
Home and Networks Mobility  
Motorola, Inc.

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<sup>1</sup> Displacement of Fixed Service Stations Operating in the 2 GHz Frequency Range to Accommodate Licensed Personal Communications Services (PCS), CPC-2-1-09, Issue 2, July 2008.

<sup>2</sup> Consultation on a Framework to Auction Spectrum in the 2 GHz Range including Advanced Wireless Services, DGTP-002-07, February 2007.