Revisions to Allocations in the Band 2500-2690 MHz and Consultation on Spectrum Utilization

Introduction

Redline Communications is a Toronto based manufacturer and supplier of broadband wireless access equipment that operates in a number of frequency bands below 6GHz. The company is committed to a standards based approach and is active in the IEEE and ETSI standardization processes. With products already compliant with the latest IEEE802.16 standards the company is an active participant in the WiMAX forum developing a certification process for interoperable wireless access systems.

Specific responses to the Consultation document

Comments are invited on the proposed changes to the Canadian Table of Frequency Allocations with regards to the footnotes in the band 2500-2690 MHz.

With reference to “ADD 5.348A” Redline Communications supports the revision of the Canadian Tables in a manner consistent with the outcome of WRC and is supportive of the equal status afforded both the fixed and mobile service in the band. Redline Communications believes this equal status is consistent with developments in wireless access standardization and the foreseen evolution of fixed access to nomadic / mobile subscribers. Additionally Redline Communications believes that the future “spectrum policy and licensing considerations” identified in footnote “ADD CXX” should reflect these developments and encourage a technologically neutral approach that will allow future operators greater flexibility and choice.

Therefore Redline Communications Inc. proposes deletion of the words “..by the mobile service…” from footnote “ADD CXX” as specific and separate licensing conditions for the mobile service are implied. The market will call for greater terminal device portability as an evolution of fixed service wireless access operation therefore service convergence should be
encouraged. Licensing strategy and policy should account for this as the traditional service demarcations become blurred.

Comments are invited on a possible re-channelization plan that could accommodate existing operations, high-power and low-power stations and both paired and unpaired band plans.

Redline Communications is aware of developments in the ITU-R dealing with this frequency range. Specifically ITU-R WP 8F is dealing with a revision of Recommendation M.1036-2 dealing with frequency arrangements in the 2500 – 2690 MHz band. Proposals are under consideration that identify paired spectrum blocks for FDD and an unpaired band central block for TDD systems. Redline Communications believes that the flexibility afforded by TDD operation will gain in importance and strongly encourages maximising the possibility for TDD operation. Therefore Redline Communications proposes that Industry Canada develops channelization plans that are consistent with international developments. A TDD block 80 MHz wide and a channel width of 5MHz are encouraged in the context of the ITU-R WP8F developments.

The Department invites comments on the long-term use of the band 2500-2690 MHz in Canada considering the new frequency allocations (i.e. mobile and fixed services).

As well as the developments noted in the consultation document there is another important development within the standardization activities of the Institute for Electrical and Electronic Engineers (IEEE). The IEEE 802.16 working group also has work underway developing a revision to the IEEE 802.16 standard for fixed broadband wireless access that enables compatible mobile (or nomadic) subscribers to be able to interwork with the fixed network. This work in task group ‘e’ will fuel the drive towards greater convergence between fixed and mobile operations. Therefore Redline Communications strongly supports the allocation of the band to both fixed and mobile services and therefore encourages an “air interface” neutral national licensing policy that will fully embrace the converged service possibility that this standardization work will facilitate.

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