



October 26, 2006

Mr. Leonard St-Aubin  
A/Director General  
Telecommunications Policy Branch  
Industry Canada  
300 Slater Street  
Ottawa, Ontario  
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**Via email**

**RE : Canada Gazette No. DGTP-006-06; Proposed Spectrum Utilization Policy,  
Technical and Licensing Requirements for Wireless Broadband Services (WBS)  
In the Band 3650-3700 MHz**

CBC/Radio-Canada has reviewed and supports the RABC and the Canadian Satellite and Space Industry Forum (CCSIF) analysis and response to Industry Canada on the introduction of the WBS service and its potential interference to FSS receive earth stations.

The CBC/Radio-Canada French and English Television and Radio Distribution receive infrastructure is mainly comprised of 4.5m receive antennas. Some of the older antennas **do not meet ITU-R Recommendation 580 (are not 2-degree compliant) and will be more susceptible to off-axis interference.**

The potential impact of WBS interference will be compounded by the imminent increase in downlink and uplink interference from ground transmission systems and adjacent satellites at plus/minus two (2) degrees. The result of this interference will have significant impact on CBC/Radio-Canada's distribution and contribution system margins, resulting in even lower carrier to interference performance (C/I) than what is indicated in the CCSIF response for interference due to "co-primary services."

CBC/Radio-Canada is very concerned about the potential interference implications from adjacent satellites and supports CCSIF's recommendations to further limit WBS - OOB emission levels to preserve its service availability.

Kind Regards,

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