



North American
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October 21, 2006

Mr. Leonard St-Aubin
A/Director General
Telecommunications Policy Branch
Industry Canada
300 Slater Street
Ottawa, Ontario
K1A 0C8

Subject: **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**

Dear Mr. St-Aubin:

The North American Broadcasters Association is an association of broadcasters in Canada, Mexico, and the United States, and the NABA Technical Committee is its standing technical body. NABA is thus in a position to present the technical viewpoints of the most authoritative association of professional North American Broadcasters in television and sound programme production, post-production, and distribution for terrestrial, satellite, and cable broadcasting. NABA also participates widely in the ITU work on radio, television and multimedia services and has a strong interest in studies related to interference to communications systems and distribution links.

In this context, NABA has been studying the requirements for the protection of C-band broadcast distribution networks from out-of-band (OoB) emissions due to potential WBS services in the neighboring 3650 – 3700 MHz band. Given the mobility and intended ubiquitous nature of the WBS services, NABA is concerned that the amount of attenuation of the power levels for the OoB emissions of WBS services the 3650-3700 MHz band that is proposed in the subject Canada gazette notice may not adequately protect the adjacent band satellite services in the 3700-4200 MHz band. NABA urges the Department to carefully review the proposed attenuation level with a view to increasing the amount of required attenuation.

Yours sincerely,

David Baylor,
Secretary General, NABA
on behalf of the NABA Board of Directors