



2017 04 13

To: Mr. Martin Proulx
Director General
Innovation, Science and Economic Development Canada
Engineering, Planning and Standards Branch
235 Queen Street
Ottawa, Ontario
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Via e-mail: ic.spectrumengineering-genieduspectre.ic@canada.ca

Subject: **SMSE-002-17: Consultation on the Technical and Policy Framework for Radio Local Area Network Devices Operating in the 5150-5250 MHz Frequency Band – Reply Comments**

Dear Mr. Proulx,

1. Bell Canada is pleased to provide Reply Comments in the above-noted consultation.
2. We actively participated in the development of the submission by the Radio Advisory Board of Canada (RABC) in this consultation. As such, we agree with the views expressed by the RABC and others who support rule changes for Radio Local Area Networks (RLANs) prior to the World Radiocommunication Conferences review of the 5150-5250 MHz frequency band (the 5 GHz band) in 2019 (WRC-19).
3. The majority of respondents to the consultation encouraged the Department to proceed with aligning the Canadian technical rules for the 5 GHz band with those implemented by the U.S. Federal Communications Commission (FCC) in early 2014 to allow deployment of both indoor and outdoor high powered devices. We continue to agree with this position.
4. With respect to the potential interference of High Powered Outdoor Devices (HPODs) on domestic and foreign satellite systems operating in the band, we agree that incumbent satellite operations must be protected. However, it is clear from the interference studies conducted in the U.S., and the deployment rules that were subsequently developed and adopted, that the use of these devices does not pose a threat to satellite receivers. In fact, we are not aware of any interference complaints having being filed with the FCC since the rule changes in early 2014. Therefore, the suggestion by some interveners that there is a potential for interference to satellite receivers is unfounded and should be dismissed.

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5. We fully expect the rapid growth and high demand for broadband services in Canada to continue. In consideration of this trend, allowing the use of HPODs in the 5 GHz band will alleviate the congestion issues being experienced and enable carriers to provide Canadian consumers with more broadband services and higher network speeds than would otherwise be available.

6. In summary, to increase the availability of much needed usable spectrum in the 5 GHz band, we encourage the Department to align the power limit deployment rules for both the indoor and outdoor RLANs with the U.S. rules. The evidence submitted in this consultation confirms that this change will not negatively impact existing satellite systems in the band. We further encourage the Department to proceed as expeditiously as possible with authorizing the use of HPODs in Canada prior to WRC-19.

Yours truly,

[Original signed by B. Chapman]

Barry Chapman

Vice President - Regulatory Affairs