



Canadian Electronics and Communications Association
Association canadienne de l'électronique et des communications

March 28, 2017

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Spectrum Information Technologies and Telecommunications
Innovation, Science and Economic Development (ISED)

Sent by Email: ic.spectrumengineering-genieduspectre.ic@canada.ca

RE: Consultation on SMSE 002 17 - Consultation on the Technical and Policy Framework for Radio Local Area Networks Devices Operating in the 5150-5250 MHz Frequency Band

I am writing to you on behalf of the **Canadian Electronics and Communications Association (CECA)** to provide additional comments from CECA members on the SMSE 002 17 consultation. Thank you for the opportunity to provide comments and opinions. We commend Innovation, Science and Economic Development (ISED) for inviting and encouraging industry to comment on this consultation that dealt with very complicated and often controversial issues.

A number of members of CECA were very active and positive participants in the formal consultation through RABC providing constructive and informative content. As such, we are in support of the RABC submission. However, since this **Technical and Policy Framework for Radio Local Area Network Devices Operating in the 5150-5250 MHz Frequency Band** is of considerable importance to members, it was felt that CECA wanted to provide comments in addition to those it contributed to the RABC consultation.

A - The demand for and benefit, if any, of allowing HPODs in the 5150 – 5250 MHz frequency band before WRC - 19

There is always a need for more broadband in Canada and a demand for wireless broadband especially to off-load data traffic to license- exempted spectrum bands. Regardless of whether in the US or Canada, in areas that are highly populated, the demand for wireless broadband capacity is very high and will grow exponentially. Therefore, wireless service providers in particular will need license – exempted spectrum to off- load data traffic. Please see the following reference:

http://www.cisco.com/c/m/en_us/solutions/service-provider/vni-forecast-highlights.html#.

For the benefit of Canadian consumers and enterprise users, CECA believes that ISED should proceed to authorize HPODs use prior to WRC – 19.

B – The potential impacts on domestic and foreign satellite systems in the 5150 – 5250 MHz frequency band of authorizing HPODs use prior to WRC – 19 on the basis on a maximum e.i.r.p. of 4W. Requirements for an elevation mask towards satellites and an exclusion zone of 25km around receiving earth stations to protect all satellite systems would likely also apply.

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ISED Submission for SMSE 002 17 March 2017

Permitting the use of high power both for indoor and outdoor devices on license-exempted band 5150 -5250 MHZ is to allow an innovative way of sharing spectrum without harming the incumbent users as the US market has demonstrated. Since FCC issued the Report and Order in 2014, no regulatory bodies have received any complaints of interferences by HPODs onto domestic or foreign satellite systems. CECA supports the RABC submission, which identifies “members in favour” of harmonizing with FCC rules for allowing high power and outdoor devices (HPODs) in 5150 – 5250 MHZ frequency band.

We absolutely agree that current and future earth stations have to be protected from interference.

C – Should the Department proceed to authorize HPODs use prior to WRC – 19, what regulatory approach would best ensure a balance of timely deployment and the protection of other existing and future services in the 5150 -5250 MHZ band? Also, indicate any and all considerations that should be given to equipment standards, technical requirements, eligibility criteria and/or conditions of license depending on the relevant approach.

CECA believes that a balanced approach would be a license-exempt approach with mandatory registration similar to the US. This would allow timely deployment of HPODs and at the same time provide a method to monitor and take action in the case of interference to incumbent users.

Once again, CECA members appreciate the opportunity to comment and look forward to hearing from ISED on next steps as a result of the formal consultation through RABC and the comments submitted herein. We trust that the substantive comments documented in this letter provide good advice to ISED and will assist and inform decisions.

Please do not hesitate to contact us at any time.

Yours sincerely,



Susan Winter, President
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About the Canadian Electronic; and Communication; Association

The Canadian Electronics and Communications Association/Association canadienne de l'électronique et des communications (CECA/ACEC) is a not-for-profit industry association representing manufacturers of electronics and telecommunications equipment. CECA member companies develop, market, manufacture and deliver wireless products and services that make up a significant part of the digital economy.

As a single entity representing some of the Canadian Wireless's industry's key players, CECA speaking with one voice can advise Innovation, Science and Economic Development (ISED) directly and through the Radio Advisory Board of Canada (RABC).

CECA members include: Cisco Systems Inc, Ericsson Canada Inc, Fujitsu Network Communications Inc, Harris Canada Systems Inc, Lenbrook Canada Solutions, Motorola Solutions Canada Inc and Nokia.