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March 28, 2017

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Spectrum Planning and Engineering
Engineering, Planning and Standards Branch
Innovation, Science Economic Development Canada
235 Queen Street
Ottawa, Ontario K1A 0H5

Re: Consultation on the Technical and Policy Framework for Radio Local Area
Network Devices Operating in the Band 5150-5250 MHz
(*Canada Gazette*, Part I, January 28, 2017, Notice No. SMSE-002-17)

CableLabs, the research and innovation consortium of the global cable communications industry, is pleased to provide technical input in the above-referenced consultation. CableLabs membership includes a number of Canadian multiple-system operators, as well as operators in the United States, Europe, Asia, and Latin America. Cable operators are leaders in Wi-Fi network deployment, and CableLabs enables wireless innovation in part through spectrum sharing research and technology development.

As the Department noted in its consultation, in 2014 the United States updated its technical rules pertaining to the use of Radio Local Area Networks (RLANs), including Wi-Fi. CableLabs was deeply engaged in that proceeding of the Federal Communications Commission, contributing the determinative analysis of coexistence between the primary incumbent satellite system and RLANs under liberalized technical rules. In our work with faculty researchers from the University of Colorado, we concluded that there is no significant risk of harmful interference from expanded use of RLANs in 5150-5250 MHz.

For completeness of the Department's record in this consultation, we hereby submit this coexistence analysis for consideration, as published at the 2014 Telecommunications Policy Research Conference (TPRC).¹

¹ Grunwald, Dirk and Alderfer, Rob and Baker, Kenneth R., *Sophisticated Wireless Interference Analysis: A Case Study for Spectrum Sharing Policy* (March 19, 2014). 2014 TPRC Conference Paper. Available at: <https://ssrn.com/abstract=2411597>

Respectfully submitted,

/s/ Rob Alderfer

Rob Alderfer
Vice President, Technology Policy
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