

Subject: ECCC response to SMSE-002-17
Date: March-24-17 10:10:50 AM
Importance: High

Bonjour Marc,

As you know, on behalf of ECCC I have been participating as an invitee to the RABC review of SMSE-002-17 and ECCC's concerns are properly reflected in paragraph 26 of the proposed RABC response (RABC Response to SMSE-002-17 Ballot draft v1.docx).

However, by this e-mail I would like to reiterate ECCC's concerns and position as a separate input directly to ISED.

ECCC is a very significant user of Radarsat data, for example in support of the mission of the Canadian Ice and Marine Services, for oil pollution monitoring, for climate modelling, for the SARWind project, for ecological monitoring in national parks, and, as our science knowledge and computing capabilities expand rapidly, the government programs, including those of ECCC and emerging ones will critically count on the higher resolution data that future CSA SAR missions will provide in the 5 GHz (5250-5470 MHz).

ECCC is concerned about out-of-band emissions from HPOD's if they are allowed in the 5150-5250 MHz band into the band 5250-5350 MHz that will be used on future SAR missions and believe that it is premature to change the Canadian rules while this band is the object of AI 1.16 of WRC-19. In addition, if 160 MHz blocks are used, emissions will be introduced directly in the band 5250-5350 MHz itself. Currently an estimated 60% of RADARSAT data is used by 37 government programs for operational purposes. The remaining 40% is used for Research and Development purposes. The integrity of that data currently and in the future must thus be ensured.

ECCC believes that the potential harm from interference outweighs the potential benefit of allowing HPODs, at least until after determinations are made at WRC-19. ECCC also noted that some members of RABC (CSA, satellite operators) questioned the accuracy of studies predicting the significant growth in HPODs – and in particular the demand for outdoor services. By deferring the review of Canadian HPOD rules until 2020, time would be provided for the completion of compatibility studies and likely establishment of an international regulatory framework post WRC-19.

In conclusion, given the opposite views on the question, ECCC suggests that ISED apply the precautionary principle and do not implement HPOD's in the 5150-5250 MHz band before completion of technical studies and agreement of international regulations by ITU. Much better assurances will be provided once WRC-19 concludes on the 5150-5250 MHz frequency band.

Please let me know if you need any clarification.

Best regards,

Gilles
