



April 19, 2011
Manager, Mobile Spectrum Planning
Engineering Planning and Standards Branch
Industry Canada
300 Slater Street,
Ottawa, Ontario K1A 0C8
By email : Spectrum.planning@ic.gc.ca

RE: Canada Gazette Notice SMSE-005-11, Feb 10, 2011 entitled “Consultation on a Policy and Technical Framework to License Spectrum in the Band 2500 – 2690 MHz”

Huawei Canada is pleased to submit comments to Industry Canada’s Gazette Notice No. SMSE-005-11, Feb. 10, 2011 entitled “Consultation on a Policy and Technical Framework to License Spectrum in the Band 2500 – 2690 MHz.”

Huawei commends Industry Canada’s allocation of 2.5 GHz bands for mobile services. Huawei supports additional spectrum for all operators, and the ability for operators to aggregate contiguous spectrum or swap for efficiency and to enhance the business case and service offering. Huawei supports 5+5 MHz channels for the FDD portion, and 10 MHz TDD channels.

Huawei is a leading telecoms solutions provider serving 45 of the world’s top 50 telecom operators. Huawei’s products and solutions have been deployed in over 100 countries and support the communications needs of one third of the world’s population. Huawei is committed to providing innovative and customized products, services and solutions to create long-term value and growth potential for our customers.

Huawei is pleased to work with Industry Canada and other stakeholders in the Industry for continued success.

Sincerely,

Kevin Dick
Director
Marketing Strategy and Industry Affairs



Huawei Canada Comments

Huawei Canada supports the need for additional mobile broadband spectrum and commends Industry Canada's allocation of 2.5 GHz bands for mobile services.

With 190 MHz at 2.5 GHz, this band is very important for the Canadian market. The 2.5 GHz band is not only important for capacity but provides the opportunity for higher speeds and innovation driven by Europe. This band is the only band currently that can support fully commercialized LTE carriers up to 2 x 20 MHz channels.

Huawei Canada believes that for spectrum efficiency, Industry Canada should focus on ways to enable band plans and licensing policies that provide for an opportunity to aggregate contiguous spectrum with 'open auction' rules.

Huawei recognizes the importance and scarcity of spectrum in Canada relative to other countries including the USA. Dedicating more spectrum for the wireless industry is critical to keep Canadian networks, capabilities, innovation and productivity at pace with other markets.

Today the USA has over 500 MHz allocated to wireless broadband mobile services where in Canada less than 270 MHz is available in the Cellular, PCS and AWS bands. 700 MHz and 2.5 GHz will help close the gap.

From a spectrum loading perspective (i.e. Sub / MHz x Pop), networks in Canada rank high compared to US and international markets, further highlighting the need for more spectrum.

Canada's wireless telecom operators are pushing the envelope with respect to technology leadership, network performance and reach, smart – phone penetration, speed and advanced services for the benefit of Canadians.



Having access to additional mobile spectrum is the key ingredient to maintaining leadership and momentum. It is crucial for Canada's wireless operators to have access to 2.5 GHz spectrum if their customers are not to be left behind or disadvantaged as wireless broadband continues to be deployed throughout Canada.

Huawei believes in more spectrum to all operators to enable growth and innovation. More spectrum will unlock capacity constraints providing better user experience and more features to consumers. This will allow the wireless industry to continue to flourish in Canada enabling new innovative products and services including devices, M2M, consumer electronics and vehicular applications.

Huawei believes that Industry Canada should license the FDD spectrum in blocks of 5+5 MHz and allow bidders to aggregate blocks into larger contiguous blocks.

Huawei recommends that the Department permit voluntary spectrum swapping to facilitate spectrum aggregation.

Huawei recommends TDD blocks sizes of 10 MHz with the possibility of spectrum aggregation and/or spectrum swapping. The 5 MHz "restricted bands" at 2570 – 2575 MHz and 2615 – 2620 MHz should be added to the adjacent allocated TDD blocks.

Any roll-out requirements should reflect propagation differences between the 700 MHz and 2500 MHz bands.