



February 28, 2011

Manager, Mobile Technology and Services  
Industry Canada  
300 Slater Street, Ottawa, Ontario K1A 0C8

By email : Spectrum.Engineering@ic.gc.ca

RE: Canada Gazette, Part I, Gazette Notice No. SMSE-018-10, Dec. 4, 2010 entitled  
“Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects  
Related to Commercial Mobile Spectrum”

---

Huawei Canada is pleased to submit comments to Industry Canada’s Gazette Notice No. SMSE-018-10, Dec. 4, 2010 entitled “Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects Related to Commercial Mobile Spectrum.”

Huawei Canada commends Industry Canada on moving the 700 MHz band forward. Canada’s wireless networks are leading-edge including technology, network capacity and reach, smart-phone penetration, speed and services. Spectrum is the fuel to maintaining leadership and momentum. Huawei participated in the preparation of the Radio Advisory Board of Canada (RABC) contribution and supports harmonization of the 700 MHz band (Option 1) with the U.S. including public safety allocations.

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. The company 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 to maximize benefits to all Canadians for this very important frequency band.

Sincerely,

Kevin Dick  
Director  
Marketing Strategy and Industry Affairs



## **Summary**

Canada's wireless telecom operators are pushing the global envelope with respect to technology leadership, network performance and reach, smart – phone penetration, speed and advanced services for the benefit of all Canadians. Having access to additional mobile spectrum is the vital ingredient to maintaining that leadership and momentum. Spectrum is the fuel that will power the next tsunami of wireless technology and innovation providing gains in productivity and innovation for business and public safety and quality of life for consumers. Every sector of the economy will benefit including e-health, e-government, mobile commerce, industry and education.

Smarter, faster devices and the plethora of new software and open applications are driving the insatiable demand for higher capacity and the need for more spectrum. The growth in wireless data continues to exceed all measures of expectation including delivering solutions to the digital divide and advanced wireless communications to all Canadians. It is crucial for Canada's wireless operators to have access to 700 MHz spectrum if their customers are not to be left behind or disadvantaged as wireless broadband continues to be deployed throughout Canada.

At 700 MHz, Huawei Canada supports harmonization of the band with the U.S. and recommends Option 1. Huawei Canada believes that Industry Canada should synchronize with the U.S. band plan, should the U.S. choose to make modifications before the Canadian auction begins as a healthy ecosystem benefits operators and consumers. Huawei Canada recommends that the Department harmonize public safety allocations in Canada with the current 5+5 MHz broadband allocation in the U.S. and license D block spectrum once the regulation and licensing situation in the U.S. has been resolved. Huawei Canada supports the Department working closely with public safety agencies and their associations in order to include spectrum management and harmonization measures that will facilitate cross-border radio interoperability. Huawei Canada agrees with the Department's proposed March 31, 2012 termination date.

## Comments

Huawei Canada supports the need for additional mobile broadband spectrum and commends Industry Canada's allocation of 700 MHz and 2.5 GHz bands for mobile services.

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 Canada agrees with the Department that it is important to have a band plan enabling "harmonization of equipment specifications to the extent possible, enabling economies of scale and greater equipment availability for consumer and infrastructure equipment", and "cross-border frequency coordination".

A band plan unique to Canada is not desirable.

Huawei Canada recommends that the Department adopt Option 1 which is to harmonize with the U.S. band plan. Huawei also recommends that Industry Canada to synchronize with the U.S. band plan, including guardbands, should the U.S. choose to make modifications before the Canadian auction begins.

Huawei Canada believes that public safety in Canada must be assured of sufficient contiguous and dedicated broadband capacity to serve public safety's mission critical broadband communication requirements.

Huawei Canada believes that the deployment of LTE would bring compatibility and enable interoperability amongst first responders in both Canada and United States where the public safety community has already sanctioned the LTE standard. Deployment of LTE by commercial operators in the adjacent 700 MHz bands may provide further roaming opportunities for public safety onto commercial networks for their non-mission critical communications.



As a minimum, Huawei Canada believes that a 5+5 MHz block for public safety broadband should be allocated providing harmonization with current U.S. public safety band plan. Huawei recommends that once the D block spectrum situation in the U.S. has been resolved, the Department should kick-off licensing procedures for D block spectrum in Canada.

Huawei Canada believes that no other suitable spectrum exists currently that could be licensed to public safety to meet the wide-area mobile broadband requirements of public safety.

Huawei Canada believes that Industry Canada should allocate a contiguous nationwide block of spectrum for broadband applications to ensure that broadband user devices will function on any public safety network in Canada.

Huawei Canada believes it is imperative that the Canadian 700 MHz public safety broadband spectrum allocation align with the U.S. band plan. The FCC in the U.S. has recently mandated the use of LTE technology for 700 MHz public safety broadband systems setting the precedent for public safety agencies. Huawei recommends that Canada align with this standard for Public Safety agencies.

Huawei Canada recommends that the Department work closely with public safety agencies and their associations in order to include spectrum management and harmonization measures that will facilitate cross-border radio interoperability in the future bands from the outset .

Huawei Canada supports the Department's proposed March 31, 2012 date.