

April 17, 2009

via e-mail

Ms. Pamela Miller
A/Director General
Industry Canada
Telecommunications Policy Branch
300 Slater Street
Ottawa Ontario K1A 0C8

Dear Ms. Pamela Miller,

Re: Canada Gazette Notice DGTP-004-08 Consultation Paper on Using a Portion of the Band 14.5-15.35 GHz for Tactical Common Data Link (TCDL) Systems

The Canadian Wireless Telecommunications Association (CWTA) is pleased to respond to Canada Gazette Notice DGTP-004-08, *Consultation Paper on Using a Portion of the band 14.5-15.35 GHz for Tactical Common Data Link (TCDL) Systems*. CWTA members participated in the development of the response of the Radio Advisory Board of Canada – CWTA supports the views expressed therein by the fixed service operators.

There is considerable investment in this band in the fixed service, which is used principally for backhaul for cellular and PCS systems. More than 1,000 fixed service links are at risk of being displaced from the 15 GHz band, with few alternatives for operators. CWTA has long advocated that the Department should make adequate spectrum available for fixed links. CWTA has also highlighted that, as advanced wireless networks are deployed, additional capacity requirements of the backhaul networks:

“CWTA submits that a significant demand for spectrum designated for the fixed service – for radio-relay - will continue to exist throughout Canada, despite the growing use of fibre by some Canadian carriers. In many instances, the use of radio-relay links is key to making the successful provisioning of these mobile wireless services in suburban and rural areas. As a result, CWTA strongly urges the Department to ensure that adequate spectrum continues to be available for fixed radio relay systems particularly as 3G mobile spectrum is licenced and systems are deployed.¹”

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¹ CWTA Comments - Canada Gazette Notice DGTP-004-02: Revision to the 1992 Spectrum Policy Framework for Canada, September 30, 2002

“Over time, however, it must be recognised that existing and new services will require increased bandwidth, necessitating improvements to the spectrum allocation and licensing process. Further, as the capabilities and bandwidth of “last mile” wireless networks advance, the capacity of backhaul and transport networks must keep pace. Fixed wireless links, particularly in the microwave bands, will continue to play a key role in these networks, accordingly adequate spectrum must also be made available for fixed links.² “

The very rapid growth of mobile broadband data services driven by the deployment of advanced mobile networks and the popularity of smartphone devices has been both anticipated and supported by Department policy. In order to meet the expected demand by end users, the 1998 and 2001 Spectrum Release plans identified 80 MHz or more of spectrum to be made available for advanced mobile service. The Department has not provided corresponding additions for backhaul demand. CWTA notes that the reduction in available fixed service spectrum in this band is occurring at the same time as proposals to reduce fixed service spectrum in the 11 GHz band. CWTA does not believe this is consistent with the Department’s role in ensuring “the orderly development and efficient operation of radiocommunication in Canada”.

CWTA recognises the importance of aerial surveillance and that that TCDL equipment used in the affected band is incompatible commercial fixed terrestrial systems. CWTA requests, however that the Department recognise the significant embedded investment and growing capacity of the fixed service when they establish the transition period for this band. CWTA therefore supports the Department’s proposals to provide a minimum notification period of five years and an additional five years in which fixed station operators may continue to operate on a no-protection basis.

Sincerely,



J. David Farnes
Vice President,
Industry and Regulatory Affairs

² Submission by the CWTA to the Telecommunications Review Panel, Industry Canada August 15, 2005