

November 30, 2020

Senior Director, Spectrum Licensing and Auction Operations Spectrum,
Information Technologies and Telecommunications Sector,
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor Ottawa, ON, K1A 0H5

Subject: Notice No. SLPB-002-20: Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band

1. Established in 1917, the Railway Association of Canada (“RAC”) represents nearly 60 freight, intercity, commuter, and tourist railways that move close to 88 million people, and more than \$310 billion in goods, across the country each year. The railways operate an extensive communications network consisting of thousands of kilometers of fibre optics, thousands of radio sites and wireless operations in some of Canada’s most remote regions. These communications are essential to the safe and efficient movement of trains across the rail network.
2. The RAC works to coordinate and support the large-scale, facilities-based telecom networks in which its members continuously invest. For instance:
 - In 1944 the RAC helped found the Canadian Radio Technical Planning Board (now the Radio Advisory Board of Canada).
 - In 2000, the RAC entered a unique arrangement whereby Industry Canada issued a single omnibus radio authorization to RAC. This was the first spectrum licence in the land mobile service. It replaced what had been for 4900 radio licences issued to RAC members.
3. The RAC would like to take this opportunity to support the comments provided by the *Canadian Electricity Association* (“CEA”) in their response titled “*Final CEA response SLPB-002-20 Oct 26 2020*”. The RAC strongly suggests that by adopting the *Citizen Broadband Radio Service* (“CBRS”) model of licensing that has been employed by the *Federal Communications Committee* in the United States that it will bring more benefit to Canadian Industry for the following reasons:
 - a. The availability of this spectrum will enable the industrial sector in Canada to be able to provide in-plant and local area mobile broadband. This will allow the industry to deploy private networks in order to enhance competitive advantage.
 - b. The CBRS environment is a rapidly maturing market in the United States. There are suppliers that have already committed to producing product for the CBRS environment. This equipment would be available to Canadian industry to create private networks. This would be a lost opportunity should this spectrum be allocated only to Mobile Network Operators (“MNOs”).
 - c. By allowing access to the spectrum by Internet Service Providers, critical industries (such as electric power companies and railways) as well as to MNOs, there will be greater use of the spectrum. To date the deployment of systems by MNOs in remote areas has been difficult to justify due to lack of demand. Allowing for industry to operate private networks in these remote areas would lead to an increase in spectrum usage.

4. In summary the RAC would recommend that *Innovation, Science and Economic Development (ISED)* consider the CEA's recommendation to implement a CBRS model licensing scheme in the 3650 - 4000 MHz range in order to encourage the operation of private networks. The ability to implement these private networks would foster innovation and efficiencies for Canadian industrial and enterprise operators leading to benefits for all Canadians.

Yours respectfully,



Marc Brazeau
President & CEO
Railway Association of Canada

cc: Enzo De Benetti, Railway Association of Canada