



Qualcomm Incorporated

1730 Pennsylvania Ave, NW ■ Suite 850 ■ Washington, DC 20006 ■ 202.263.0020 office ■ www.qualcomm.com

October 26, 2020

Via E-Mail

Innovation, Science and Economic Development Canada
c/o Director, Spectrum Regulatory Best Practices
235 Queen Street (6th Floor, East Tower)
Ottawa ON K1A 0H5
ic.spectrumauctions-encheresduspectre.ic@canada.ca

Re: Response to ISED 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 - SLPB-002-20 - Canada Gazette, Part I (Aug. 2020)

Dear Madam/Sir:

Qualcomm strongly supports Canada’s consultation on the technical and policy framework for the 3650-4200 MHz band (hereinafter the “3800 MHz band”) issued by the Innovation, Science and Economic Development Canada (“ISED”), on behalf of the Minister of Innovation, Science and Industry. Opening this mid-band spectrum now for flexible uses to support fixed and mobile services is critically important to the successful rollout of 5G services throughout Canada.

Qualcomm is a leading wireless technology developer and provider of chipsets used in billions of smartphones, tablets, and other wireless devices as well as small cells, Wi-Fi access points, automobiles, and space equipment. Qualcomm’s technology advances drove successful 2G, 3G, and 4G deployments, and we are now driving the rapid proliferation of 5G in North America and worldwide. We strongly support the proposal to make the 3800 MHz band available for flexible use services, and we encourage ISED to authorize such uses of this band and conduct a spectrum auction as soon as possible.

Qualcomm encourages ISED to follow the technical rules that the U.S. FCC has implemented for flexible use operations in the 3700-3980 MHz band and also to look to 3GPP standards for 5G NR band n77 that apply to operations in this key mid-band spectrum. We also encourage ISED to license the 280-MHz wide spectrum (from 3700-3980 MHz) in blocks larger than 10 MHz. Nonetheless, should ISED license the spectrum as 28 unpaired 10-MHz-wide blocks of spectrum as proposed, we strongly support ISED permitting the aggregation of multiples of 10 MHz blocks to facilitate large bandwidth channels for 5G technologies.

We applaud ISED’s active approach to maintaining a steady stream of new spectrum bands for advanced mobile services because it is crucially important for the successful roll-out of 5G. For decades, North America’s mobile technology leadership has been based on a regulatory approach that has appropriately favored spectrum clearing, exclusive-use spectrum licenses, flexible use rights, private sector investment, and competition. Indeed, fully cleared, exclusively licensed spectrum remains the top priority for the wireless industry to continue North America’s mobile technology leadership and enabling the rapid, broad roll-out of 5G.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. R. Brenner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dean R. Brenner
Senior Vice President, Spectrum Strategy &
Technology Policy

A handwritten signature in purple ink, appearing to read "John W. Kuzin". The signature is cursive and includes a large, stylized initial "J".

John W. Kuzin
Vice President and Regulatory Counsel