

February 16, 2018

Director, Spectrum Regulatory Best Practices
Innovation, Science and Economic Development Canada
235 Queen Street
Ottawa, Ontario K1A 0H5
Sent via email to: ic.spectrumbauctions-encheresduspectre.ic@canada.ca

Re: Consultation on the Spectrum Outlook 2018 to 2022, *Canada Gazette*, Part I, October 2017 (SLPB-006-17)

To Director, Spectrum Regulatory Best Practices:

Sprint Corporation (“Sprint”) hereby submits its comments in response to Innovation, Science and Economic Development (ISED) Canada’s *Consultation on the Spectrum Outlook 2018 to 2022*, (SLPB-006-17). Sprint’s particular interest in this consultation is in response to Question 20; specifically, as related to the 800 MHz band.

Sprint is supportive of ISED’s proposal to enable commercial mobile broadband as a service / application in the specified frequency range (814-824 paired with 859-869 MHz), and contends that this repurposing would mutually benefit the United States and Canada by maximizing the spectrum available for commercial mobile broadband in this band along our countries’ shared border regions.

Over many years, Sprint has been conducting a nationwide reconfiguration of the 800 MHz band in the United States in accordance with a Federal Communications Commission (FCC) initiative to separate public safety licensees from commercial cellularized operations to reduce and eliminate harmful interference to public safety operations which were both adjacent and interleaved with incompatible commercial operations. This nationwide, multi-billion dollar project is nearly complete across the United States (with exceptions mainly along the U.S. - Mexican border). In reconfiguring the 800 MHz band, legacy and public safety narrowband operations have been relocated to the lower portion of the band (806-816 / 851-861 MHz)¹ while the 817-824 / 862-869 MHz portion of the band has been designated for commercial broadband operations with a 1 MHz guard band in between. As Sprint has completed the 800 MHz band reconfiguration, it has moved aggressively to deploy both a 3G CDMA carrier and a 5 x 5 MHz

¹ In the Southeastern portion of the United States, narrowband operations are permitted between 806 -813.5/ 851 – 858.5 MHz), while the Enhanced Specialized Mobile Radio (“ESMR”) portion of band is 813.5 – 824 MHz paired with 858.5 – 869 MHz). This area of the United States has an expanded ESMR band due to the existence of two larger ESMR operations who needed to be relocated. Both operations could not be accommodated between 817- 824 MHz/862- 869 MHz.



4G LTE carrier in this broadband allocation. Because of the 800 MHz band's enhanced ability to provide in-building penetration and extensive geographic coverage, this spectrum is well suited to a nationwide broadband deployment.

One of the more challenging aspects of the 800 MHz band reconfiguration process was in retuning or relocating public safety operations out of the upper portion of the band. In the United States, the National Public Safety Planning Advisory Committee ("NPSPAC") spectrum (dedicated for Public Safety use) has been relocated from 821-824 / 866-869 MHz to a new dedicated allocation in the lowermost U.S. Primary portion of the 800 MHz band (806-809 / 851-854 MHz). The process of relocating all U.S. narrowband operations from the upper portion of the band into the lower portion of the band along the U.S./Canada border is complete (the last physical reconfiguration of narrowband systems was completed along the Canada-US border in January 2017, when the state of Washington was completed²); however, making the 800 MHz band fully usable for mobile broadband along the common border requires Canada to follow suit in transitioning remaining Canadian public safety licensees into a lower Canada Primary portion of the band. This will eliminate technical challenges and the risk of interference from Sprint operations along the border to existing public safety use in Canada. In order to better enable Sprint's use of Band 26 spectrum for mobile broadband service, Sprint respectfully requests that ISED initiate a process of transitioning Canadian narrowband incumbents out of the 3GPP Band 26 sub band – including public safety operations in 821-824/866-869 MHz – in order to bring Canada into alignment with the current U.S. band plan and thereby eliminate the potential for cross-border interference and to enhance broadband operations along both sides of the common border.

Sprint notes that ISED's consultation addresses the entire Band 26 portion of the 800 MHz band (814-824 / 859-869 MHz). Sprint supports this initiative as an effort to more closely align potential Canadian broadband operations with Sprint's current and potential future use. As Canadian public safety and legacy narrowband users have relocated out of sufficient contiguous portions of the 816-824/861 – 869 MHz band, Sprint would expect to closely coordinate its broadband usage with a compatible Canadian commercial broadband operation to realize the benefits of cross border operations and increased spectrum usability. Sprint would be supportive of ISED authorizing the full Band 26 portion of the 800 MHz band in Canada, such that Sprint could be in a position to enhance spectrum usability and provide improved coverage and capacity for its customers along the border.

² *800 MHZ TRANSITION ADMINISTRATOR, LLC QUARTERLY PROGRESS REPORT FOR THE QUARTER ENDED SEPTEMBER 30, 2017*, Appendix 9, published December 14, 2017. http://www.800ta.org/content/reporting/QPR_09.30.17.pdf



Should there be any questions, please contact the undersigned.

Respectfully submitted,

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