



2018 03 02

To: Mr. Martin Proulx
Director General
Engineering, Planning and Standards Branch
Spectrum, Information Technologies and Telecommunications Sector,
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5

Via email: ic.spectrumengineering-genieduspectre.ic@canada.ca

Subject: **SMSE-019-17: Consultation on the Technical, Policy and Licensing Framework for Wireless Microphones (WMs) – Reply Comments**

Dear Mr. Proulx,

1. As specified in the amended timeline for inputs in Gazette Notice SMSE-019-17, we are pleased to provide our Reply Comments on Innovation, Science and Economic Development Canada (ISED's) technical and policy framework for WMs. We have reviewed the interveners' comments posted on ISED's website and offer the following observations for the Department's consideration.

2. There was generally agreement among interveners, including us, with the Department's proposals related to questions 1, 2 and 4. With respect to question 1, respondents supported the proposal to harmonize Canada's technical rules with those in the U.S. to allow low power WMs in the guard band (614-617 MHz) and duplex (652-663 MHz) gap, as well as to use a 1 MHz frequency separation for WMs around the mobile service downlink spectrum (617-653 MHz). On question 2, interveners overwhelmingly supported the proposal to introduce the use of WMs, on a secondary basis, into the frequency bands 941.5-952 MHz, 953-960 MHz, 6930-6955 MHz and 7100-7125 MHz with appropriate conditions to prevent interference to fixed services. On question 4, interveners supported the proposal to licence the operations of WMs on a secondary basis in the frequency bands 941.5-952 MHz and 953-960 MHz, 6930-6955 MHz and 7100-7125 MHz, based on eligibility criteria.

3. With respect to Question 3 regarding the proposal to allow WMs to access the broadcasting bands (54-72 MHz, 76-88 MHz, 174-216 MHz, 470-608 MHz), the duplex gap (652-663 MHz) and the guard band (614-617 MHz) on a licence-exempt basis, and the voluntary licensing of eligible users' of WMs, the majority of respondents supported the Department's proposals. Most, but not all, interveners also agreed with the Department's proposal to extend licence eligibility to professional users and users employing a significant number of WMs and who can demonstrate a need for high quality audio. We continue to support this position.

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4. With respect to ISED's proposal to extend voluntary licensing to professional users or users which employ a significant number of WMs as part of their production/events, Dynamic Spectrum Alliance noted that the definition of "significant number" proved to be a challenge in the U.S. The U.S. has since defined the term as 50 licence-exempt WMs at a particular event and Dynamic Spectrum Alliance recommended that the Department adopt the same definition. We do not object to this recommendation.

5. Should you have any questions please do not hesitate to contact me.

Yours truly,

[Original signed by M. MacInnis]

Michael MacInnis

Vice President - Regulatory Affairs

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