



March 31, 2026

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Innovation, Science, and Economic Development Canada
235 Queen Street
Ottawa, Ontario
K1A 0H5

Dear Sir/Madam:

Re: *Canada Gazette, Part I, February 14, 2026, Notice No. SPB-002-26 – Consultation on the Revisions to the 2500-2690 MHz Band Plan – Eastlink’s comments*

Please find attached the comments of Bragg Communications Inc., carrying on business as Eastlink ("Eastlink"), in response to Canada Gazette Notice SPB-002-26 – *Consultation on the Revisions to the 2500-2690 MHz Band Plan*.

We appreciate the opportunity to provide our views to the Department.

Sincerely,

A handwritten signature in blue ink that reads "Marielle Wilson". The signature is written in a cursive, flowing style.

Marielle Wilson
Vice President, Regulatory and Government Affairs

**INNOVATION, SCIENCE, AND ECONOMIC DEVELOPMENT CANADA
CONSULTATION ON THE REVISIONS TO THE 2500-2690 MHz BAND PLAN
CANADA GAZETTE, PART I, FEBRUARY 14, 2026, NOTICE NO. SPB-002-26**

**COMMENTS OF
BRAGG COMMUNICATIONS INC., OPERATING AS EASTLINK**



March 31, 2026

1. Bragg Communications Inc., carrying on business as Eastlink (“Eastlink”), appreciates the opportunity to provide comments on SPB-002-26 – *Consultation on the Revisions to the 2500-2690 MHz Band Plan* (the “Consultation”).
2. Through the Consultation, Innovation, Science and Economic Development Canada (“ISED”) seeks input on revising the band plan for Broadband Radio Service (BRS) in the 2500-2690 MHz range (referred to as the 2500 MHz band), as well as a preliminary consultation on the transition to a new band plan.
3. Following a consultation in 2010, ISED issued *Decisions on a Band Plan for Broadband Radio Service (BRS) and Consultation on a Policy and Technical Framework to License Spectrum in the Band 2500-2690 MHz*. In that decision, ISED considered whether to adopt the US or International Telecommunications Union (“ITU”) band plan for the 2500 MHz band, and determined to follow the ITU band plan as it would:
 - allow the deployment of both Frequency Division Duplexing (“FDD”) and Time Division Duplexing (“TDD”) systems (whereas the US band plan only allows for TDD systems);
 - permit global harmonization, thus enabling economies of scale for equipment and international roaming; and
 - enable access to a wider range of services and applications which were expected to be developed on a global basis.
4. The Consultation describes that in recent years, Canadian operators have reported growing interference issues with deployments along the border, particularly in the 2500-2570 MHz range. Impacted licensees requested ISED consider transitioning to an unpaired band plan in order to address these interference issues in the long term. ISED considers that adopting an unpaired band plan could have the following benefits:
 - supporting long-term and sustainable use of the band for 5G and future networks;
 - facilitating cross-border coordination with the US; and
 - allowing Canadian licensees to benefit from the large TDD equipment ecosystem.
5. ISED’s policy objective for the Consultation is to maximize the economic and social benefits that Canadians derive from the use of the radio frequency spectrum resource. The

Consultation is also driven by the need for high-quality services, facilitating innovation, and efficient use of spectrum.

6. Eastlink submits that the limited benefits of transitioning to an unpaired band plan are outweighed by the substantial operational, financial, and investment impacts on licence holders. The current radio equipment deployed based on the ITU band plan is incompatible with the US band plan, and would need to be entirely replaced. This will have extensive impacts on operators' existing and future investments, to the detriment of both operators and Canadians, and contrary to ISED's policy goals.
7. In the event ISED moves forward with transitioning to an unpaired band plan, Eastlink submits this must be delayed until 2035, which corresponds with the end of the current term for licenses in the 2500 MHz band. Transitioning all of our radio equipment at hundreds of locations across Canada will involve substantial network engineering and budgetary impacts. Therefore, such a delay is appropriate given the scale of the work involved with such a transition.

Consultation Questions

Q1 ISED is seeking comments on its proposal to revise the band plan to an unpaired band plan in 2500-2690 MHz.

8. Eastlink strongly opposes revising the 2500 MHz band to an unpaired band plan due to the substantial operational, financial, and investment impacts on operators.
9. Eastlink has invested millions of dollars in equipment in the deployment of our 2500 MHz band. This does not include the costs of acquiring this spectrum, or the engineering efforts regarding network design, planning, and implementation. If the 2500 MHz band transitions to an unpaired band, this equipment will need to be replaced at around half of its expected lifespan as our current radio and antenna systems are not compatible with an unpaired band.
10. The consequences of replacing all our radio equipment in the 2500 MHz band will be extensive:

- a. **Wasted Resources.** Network operators across the industry have deployed hundreds of millions of dollars in network infrastructure to support the 2500 MHz band. In order for licensees to continue using their licenses, this equipment will need to be replaced long before the end of its expected lifespan. As a result, operators will be unable to recoup the costs of those substantial investments, and will further need to set aside funding years sooner than expected in order to replace it with compatible equipment. In addition to the substantial wasted financial resources, this will generate massive amounts of electronics waste for what is otherwise still functioning equipment.
- b. **Additional Costs.** Redesigning how the 2500 MHz band spectrum is deployed within our network will require extensive planning by our engineering teams. In some cases, structural reinforcements and adaptations may be required to support the new radio equipment. In addition to the equipment placed on our own towers, new equipment will also be required at sites owned by third parties. Where we rely on agreements with third parties to allow us to attach our equipment to rooftops and other operators' towers, in some cases we will face additional fees (sometimes thousands of dollars per change change) related to swapping out this equipment, and adding further antennas if needed. Many of these third parties charge a fee per antenna, and we have 3 to 6 antennas at each of our sites. With deployments at a couple hundred sites across Canada, these fees will add up to a substantial amount.
- c. **Reduced Future Investments.** Having to allocate millions of dollars in the near future to change our current infrastructure will mean less resources available for investments that actually further ISED's policy goals. Infrastructure budgets will be used to change equipment where we have already met our spectrum deployment requirements, instead of expanding our 2500 MHz deployments to cover new areas, expanding deployments in other bands, or acquiring and deploying new spectrum in innovative ways. This will have the greatest negative impact on investments in rural areas where the business case to serve those areas is already challenging. These consequences to investment are directly contrary to ISED's policy goals of maximizing the benefits Canadian derive from spectrum, efficiently using spectrum, and facilitating innovation.
- d. **Lost Benefits of the ITU Band Plan.** Operators will lose out on the benefits from the economies of scale in equipment, services, and applications which come with the ITU

band plan. These benefits were part of the reason the ITU band plan was adopted in the first place in *Decisions on a Band Plan for Broadband Radio Service (BRS) and Consultation on a Policy and Technical Framework to License Spectrum in the Band 2500-2690 MHz*.

- e. **Risk of Impacts to Consumers.** There is a risk some older devices will be incompatible with TDD systems, resulting in reduced device capability.

11. Issues of potential interference ought to have been considered and addressed during the initial consultation on whether to implement the US or ITU band plan. Our initial purchase, recent renewal in 2021, and our equipment deployments to meet ISED's requirements were all based on the ITU band plan. In order to be usable in an unpaired band plan, that work and investment would largely need to be redone. We submit that before causing the industry to spend hundreds of millions of dollars and setting back Canadian network investment, alternative long-term solutions to address border interference must be thoroughly explored.

Q2 *ISED is seeking comments on whether starting the transition to an unpaired band plan in 2028 is appropriate and how long licensees may require to complete the transition.*

12. Eastlink submits that if ISED chooses to transition to an unpaired band plan, which Eastlink opposes, the transition should not begin until 2035, which aligns with the end of the current licence terms for the 2500 MHz band. This will allow operators to use the equipment already purchased for its anticipated lifespan, which will reduce the amount of wasted investment, and provide sufficient time for operators to recoup their costs associated with existing deployments in this spectrum band.

13. Eastlink submits that a 5-year timeline would be required to complete the transition to an unpaired band. A multi-year transition timeline is needed to account for budgetary impacts and network planning. Given the length of time to complete infrastructure projects, budgetary and investment decisions are made far in advance. We will require time to ensure funding can be allocated to the transition in a way that reduces the impact on current investments plans, and aligns with our network modernization goals. Our engineering teams will also need to undertake extensive planning in order to incorporate the new equipment into our existing

network. For example, the new radios may have different load impacts on the network which will need to be carefully considered and addressed. Further, it will take substantial time for a transition plan to be coordinated among operators, and to complete the physical work of changing out and integrating the new radio equipment.

Q3 *ISED is seeking comments on whether deployment requirements should be adjusted in anticipation of transition to the new band plan.*

14. The Consultation's proposal has created significant uncertainty regarding the future of the 2500 MHz band. It would be unreasonable to expect operators to continue expanding deployments in this band over the next few years if those deployments would become incompatible. Further, as the current radio equipment is incompatible with the US band plan, licensees will effectively have to re-do all their existing deployments to meet the current population percentages already covered. In light of this, Eastlink submits that if ISED decides to transition to a new band plan, deployment requirements must be paused for all licence holders in the 2500 MHz band. Current deployment requirements can then be applied using the year the transition starts as the license issue date (eg. for Tier 3-01, the 30% minimum population coverage would need to be met 10 years from 2035).

Q4 *ISED is seeking preliminary comments on a transition plan to the proposed band plan, including:*

15. Although Eastlink opposes transitioning to an unpaired plan for the 2500 MHz band, if ISED proceeds to do so, we provide the following comments and recommendations on ISED's transition plan.

a. *should the transition strategy be implemented on a market-by-market basis across Canada? If so, which regions should be prioritized and how should the timelines be staggered?*

16. Eastlink submits that a phased approach is necessary as operators in this band with deployments across Canada will need to replace their equipment. A phased approach ensures operators have sufficient time to transition to equipment compatible with an unpaired band, and allows time for operators to coordinate the transition to minimize the impact on

Canadians. We submit that the areas experiencing interference from US operators should be prioritized in the transition. This provides additional time for the operators who are not impacted by US interference to transition their networks. A transition timeline of 5 years starting in 2035 is appropriate. Based on this total timeline, the timelines for each area can be staggered to occur at reasonable intervals, allowing more time for areas with a larger number of operators and deployment sites. If ISED proceeds with transitioning the 2500 MHz band plan, a more detailed transition plan will need to be coordinated.

b. should certain portions of the band, such as the Canadian FDD uplink spectrum, be prioritized first during the transition?

17. A partial transition of the band is impractical due to an increased risk of interference with adjacent providers' spectrum. There is no practical or economical solution Eastlink is aware of to allow TDD and FDD systems to co-exist. Therefore, it is both more cost-effective and will result in the least disruption if the entire band is transitioned at the same time within each area.

c. do licensees prefer holding contiguous blocks of spectrum in an unpaired TDD-use band plan? If so, what process is envisioned to enable the exchange of frequency assignments?

18. Our preference is for contiguous blocks of spectrum as this improves the utility of the spectrum. Contiguous blocks also require fewer guard bands, which results in more efficient spectral use in line with ISED's policies. Spectrum redistribution can be coordinated among operators or directed by ISED as needed.

d. what is the appropriate tier level for the transition and how might the deployment requirements be adjusted to reflect this?

19. Eastlink submits the appropriate tier level for the transition is Tier 4. The areas transitioned must be small enough to be operationally feasible, while not so small as to overcomplicate coordination between operators during the transition. In our view, the Tier 4 level strikes the appropriate balance of these considerations.

20. With respect to comments on deployment requirements, we defer to our comments on question 3 above.

e. are there any temporary or longer term technical requirements that ISED should consider to minimize the potential for interference conflicts during the transition period?

f. are there any other key elements that ISED should consider for a transition plan?

21. While a gradual transition is the only feasible way to transition to an unpaired band plan, we caution ISED that there will still be a risk of interference as the transition occurs. As each Tier 4 area transitions, the surrounding un-transitioned areas will need to take steps to mitigate any interference including muting towers along the bordering Tier 4 areas until they can also transition. Despite operators' best efforts, some interference may still occur. Further, there is a risk of quality of service impacts for consumers should any problems occur during the transition. For these reasons, we reiterate that alternative measures to address interference along the US border should be investigated.

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