



**ECOTEL**

3400 Bd L.-P.-Normand,  
Trois-Rivières, QC G9B 0G2

1-866-ECO-TEL1

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**Chantal Davis**

*Senior Director, Regulatory Policy  
Spectrum Licensing Policy Branch  
Innovation, Science and Economic Development Canada  
235 Queen Street, East Tower, 6th Floor  
Ottawa, ON, K1A 0H5*

sent by email to : [spectrumauctions-encheresduspectre@ised-isde.gc.ca](mailto:spectrumauctions-encheresduspectre@ised-isde.gc.ca)

**Re:    Gazette Notice, Part I, Vol.160 No.7, February 14 2026, Notice No. SPB-002-26 -  
      Consultation on the Revisions to the 2500-2690 MHz Band Plan**

Ms. Davis,

1. ECOTEL Inc. ("ECOTEL") is pleased to submit these comments to Innovation, Science and Economic Development (ISED) in response to the SPB-002-26 : Consultation on Revisions to the 2500-2690 MHz Band Plan (the Consultation), published in the Canada Gazette Part 1, Vol 160, no 7, February 15 2026.
2. ECOTEL's mission, along with its sister company AMBRA SOLUTIONS, is to provide customized private Networks solutions to improve business productivity and workers' safety for its Industrial customers.
3. These networks are the foundation for Industry 4.0 transformation. They enable various use-cases, such as autonomous vehicles, teleoperation to improve efficiency and productivity.
4. ECOTEL and AMBRA Solutions, are recognized as global leaders in the provision of robust and efficient Private Mobile Network (PMN) solutions. Over the past two years, AMBRA Solutions has been recognized as a global leader and is part of the Gartner Magic Quadrant for PMN.

5. ECOTEL also deploys and operates cost efficient wireless public networks that are used by partners to provide service to remote and rural communities left unserved by larger public wireless service providers.
6. ECOTEL understands that the present BRS band reconfiguration process arises primarily from the inability of BRS licensees (specifically the in FDD portion, designated as Band 7) to effectively utilize their assigned spectrum in areas adjacent to the United States (where the same band is being used in a TDD mode). This issue is further exacerbated by the fact that it occurs within the most densely populated regions of the country.
7. The transition to a time duplex mode is allowing the use, where needed, of advanced radio features such Massive-MIMO improving capacity (spectral efficiency) mostly on the forward stream. Due to the price tag associated with this type of equipment, it is more beneficial to limit its deployment to populated areas.
8. The transition of the BRS band from a mixed FDD/ TDD use to a full TDD use is seen by ECOTEL as a solution to solve an “urban problem”. Outside of the major (top 20) urban areas of Canada, and USA border areas, nothing economically justifies transitioning the BRS band before the hardware in place reaches the end of its useful life.
9. Since, B7 infrastructure is still being deployed today, ECOTEL is suggesting ISED to use a 10-year timeframe to transition the rural and remote areas from the date ISED will issue its decision.
10. ECOTEL holds primary licenses in the TDD portion (Band 38) and subordinate licenses in the FDD portion (Band 7) of the BRS band. These licenses are used for the deployment and operation of private networks by its industrial clients across the country. Such networks are critical to business continuity and workers’ safety. As such, they are engineered to deliver level of availability that exceeds by many folds those expected from similar public networks.
11. Unlike public network operators, these enterprises do not have access to alternative frequency bands to which they could migrate during any potential transition phase. Accordingly, ECOTEL recommends that ISED incorporates provisions ensuring temporal predictability and operational continuity within its determinations, to minimize the impacts that any changes may have on these enterprises and their competitiveness.

12. In the following paragraphs ECOTEL provide detailed answers to the questions raised in this Consultation.

## **Q1**

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

13. As previously mentioned earlier in this document, ECOTEL recognizes that the proposal to transition the BRS band an TDD-only use has become unavoidable since the current interference issues with US carriers' stations operating near the border is rendering the FDD portion (B7) of the band unusable by Canadian operators. This problem is further exacerbated by the fact that it occurs within the most densely populated regions of the country where traffic demands is higher. For that reason, ECOTEL agrees with ISED's proposed band plan revision.
14. ECOTEL also sees the benefit of using TDD in densely populated areas where smaller cell range and reduced time delays are suitable for more spectrally efficient radio interface techniques such as Massive-MIMO (M-MIMO).
15. Despite being the obvious path going forward, ECOTEL would like to highlight the fact that this necessary transition to TDD is the answer to an "urban centric problem". Outside of the USA border area, the current use of the FDD portion is doing well and is supported by a mature material ecosystem worldwide. As such, ECOTEL recommends to push further in time the transition of none-interfered markets.

## **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.***

16. ECOTEL, as per other licensees, is still deploying new BRS band radios in both TDD(B38) and FDD(B7) portion of the band. The expected useful life of such equipment is ranging between 7 to 10 years. As such, any replacement prior to this window would negatively impact the financial bottom line of any organizations.
17. Following this guideline and assuming that an ISED decision would be taking place by the end of the current year, no transition should begin before 2034. Furthermore, to make the CAPEX

intensity manageable by the licensees' organization, the transition should be spread over multiple years. ECOTEL believes that a 5-year transition period would provide the predictability required to ensure a smooth transition.

### **Q3**

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

18. ECOTEL submits that deployment requirements should be materially adjusted, if not fully suspended, once ISED formally announces its decision to transition the band at a defined future date.
19. From a regulatory and investment-efficiency standpoint, maintaining existing deployment obligations after such an announcement would create a structural misalignment between regulatory compliance and rational capital allocation. Licensees would remain compelled to deploy infrastructure in the current band configuration despite the fact that, upon announcement, the current equipment becomes functionally time-limited and commercially obsolete. This would inevitably lead to stranded capital, accelerated asset depreciation, and inefficient use of spectrum resources, outcomes that run against ISED's policy objectives of promoting efficient spectrum utilization and sustainable network investment.
20. Accordingly, ECOTEL recommends that upon announcing its decision to go ahead with the transition and the associated timelines, ISED should lift or suspend all deployment requirements tied to the current BRS band licenses.
21. In parallel with the transition announcement, ISED should also publish the technical rules associated with the future band plan (namely SRSP and RSS documents). This is critical to enable current licensees, particularly those operating TDD networks, to procure equipment that is compatible with the future band configuration and to begin deployment of infrastructure that could be seamlessly re-used post-transition.

### **Q4**

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

**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?**

22. As explained above, in order to reduce the CAPEX intensity required, ECOTEL is recommending ISED to spread the transition over a 5-year period using the table below in which the largest markets facing US border are addressed in priority.

Phase	Area	Year
1	Approx Qc-Windsor axis (below NorthBay ON)	2034
2	BC Lower Mainland	2035
3	Lower Prairies (incl. Edmonton, Saskatoon and Winniped) & remaining of BC	2036
4	Maritimes and remaining of ON & QC	2037
5	Northern Prairies & Northern Canada	2038

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

23. As previously stated, the networks deployed and supported by ECOTEL cannot rely on alternative frequency bands to maintain continuous operations during the transition period. Accordingly, the transition methodology must ensure uninterrupted service continuity within the existing band.

24. Any option that involves partial or interim use of the spectrum, such as its temporary use as a supplementary downlink channel, would not meet this requirement and is therefore not viable.

25. In this context, a flash-cut (hard cut-over) transition approach is likely the most appropriate option to ensure operational continuity and minimize service disruption.

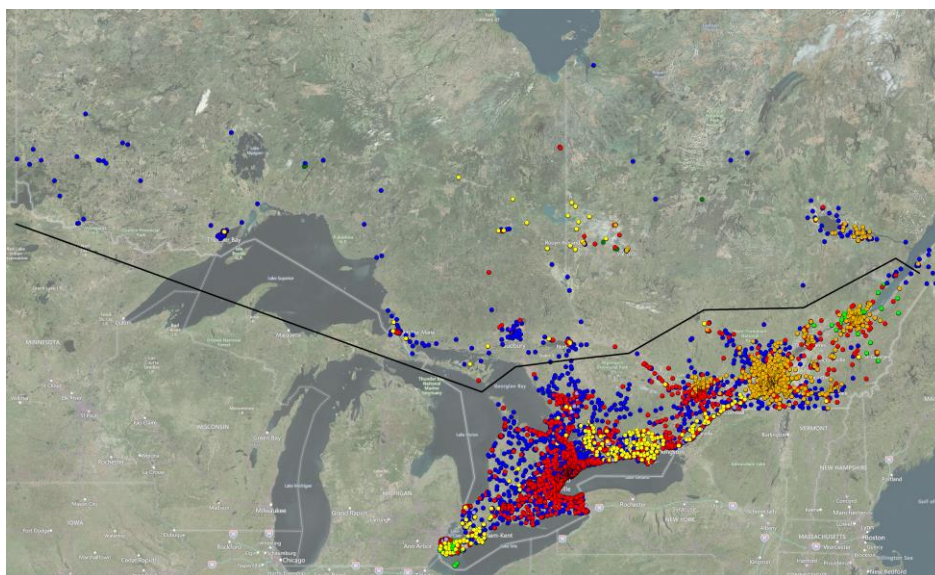
**c. do licensees prefer holding contiguous blocks of spectrum in an unpaired TDD-use band plan? If so, what process is envisioned to enable the exchange of frequency assignments?**

26. For obvious operational efficiency reasons, in any given tier, each licensee, should end up at the end of the transition with contiguous blocks of spectrum.

27. ECOTEL is of the view that incumbent Band 38 licensees should, where they so elect, be afforded priority access to the Band 38 portion of the post-transition band plan. This approach would enable the continued use of existing radio equipment for the duration of its remaining useful life.
28. To accommodate incumbent Band 38 licensees, it may be necessary—depending on the number of such licensees—to implement an interim transition phase during which certain Band 41 licensees may temporarily hold non-contiguous spectrum blocks. This transitional arrangement should be time-limited, with a maximum duration of five (5) years.
29. To promote the efficient use of spectrum in the BRS band, ECOTEL recommends that ISED incorporate, within the assignment framework, a provision allowing licensees to request the assignment of adjacent spectrum blocks.

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

30. In order to minimize the risk of interference during the transition process, the transition phase borders should not be forced to fit exactly with existing service areas (or tiers) but instead use natural deployment borders.
31. ECOTEL suggests establishing the exact transition phase borders base on the actual location of stations registered in ISED SMS database. The figure below provides an example of potential transition phase border for Ontario and Quebec area.



***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?***

32. Using custom made transition borders based on actual station location is probably the most efficient way to minimize interference during the transition.

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

33. The first step of the proposed BRS band transition is the publication of the radio specifications to allow the radio equipment manufacturers to start planning the delivery of the band 41 compatibles equipment to the Canadian Market.

34. ECOTEL would like to thank the ISED for the opportunity to provide these comments.

*Sincerely,*



**Eric L'Heureux, P.Eng.**  
President, CEO and Founder  
ECOTEL inc.  
T: 1.877.374.3997 x1010