

30 March 2026

Innovation, Science and Economic Development Canada

Re: Consultation on the Revisions to the 2500-2690 MHz Band Plan¹

Dear ISED,

The GSMA appreciates the opportunity to present our perspectives regarding the proposed revisions to the 2500-2690 MHz band plan.

We agree that maximising the use and efficiency of currently available spectrum will support the continued development and deployment of mobile technologies in Canada. This comes at a critical time when demand on mobile networks is increasing, and mobile network operators need the right amount of spectrum to maintain and enhance quality of service.

The 2.5 GHz band will remain important for dense urban 5G deployments and as a bridge between legacy LTE and future 6G because of its wide bandwidth and global device support. As such, there continues to be a growing compatible ecosystem and deployment of mobile networks in the band worldwide.

The GSMA believes that transitioning to an unpaired TDD band plan in 2.5 GHz will give Canadian mobile network operators greater flexibility to deploy networks that serve Canadian consumers and businesses while facilitating cross-border coordination with the US.

We have responded to questions one and two below covering our positions in more detail.

We hope this is helpful and are available for any additional questions or meetings as needed.

Yours sincerely,

Luiz Felipe Zoghbi
Spectrum Engagement Director
GSMA

¹ The *Canada Gazette*, Part I, February 2026, Consultation on the Revisions to the 2500-2690 MHz Band Plan (SPB-002-26).

Response to question 1:

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

The GSMA agrees with ISED's proposal to revise the band plan to an unpaired band plan in 2500-2690 MHz. Canadian mobile network operators have been at the forefront of global mobile network development, having invested more than [\\$50 billion in mobile CapEx since 2010](#). This includes a \$4 billion investment in 2023, as operators continued to deploy 5G networks across the country. The impact of these investments is already starting to be felt as 5G connections are now above 62%, surpassing 4G (36%). Transitioning to an unpaired band plan could improve cross-border coordination and maximise the usability of the spectrum.

As such, the GSMA welcomes ISED's consideration to modify the 2.5 GHz band plan to support ongoing network investment and development, considering market demand.

To increase flexibility as well as make spectrum usage more efficient, TDD is becoming increasingly common and important. TDD uses the same frequency for each duplex direction, with a frame that includes different time periods and slots for uplink or downlink communications. By changing the duration of these, network performance can be tailored to meet different needs and help provide the best possible experience.

Response to question 2:

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.

The GSMA recognises that Canadian mobile network operators who are operating within the band will require time to upgrade their network infrastructure to support the new TDD arrangement. Therefore, operators will be best placed to determine how long it will take to complete the transition and begin deployment in the band.