

**Innovation, Science and Economic Development  
Canada**

***Consultation on the Revisions to the 2500-2690 MHz  
Band Plan***

**Notice No. SPB-002-26**

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**Comments  
of  
Xplore Inc.**

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**March 31, 2026**

## **Introduction and Executive Summary**

1. Xplore Inc., on behalf of itself and its affiliate Xplore Spectrum 1 Network Limited Partnership (together, “**Xplore**”), files its comments with respect to the consultation, SPB-002-26, *Consultation on the Revisions to the 2500-2690 MHz Band Plan* (“**Consultation**”), initiated by Innovation, Science and Economic Development Canada (“**ISED**” or the “**Department**”) and published in *Canada Gazette*, Part 1, Volume 160, Number 7, on February 14, 2026.
2. Since our inception, Xplore has had a mission to deliver better, faster Internet for rural Canadians. Xplore offers Internet services to Canadians in rural and remote communities from coast-to-coast using a variety of technologies including its 5G fixed wireless network, next-generation geostationary satellite infrastructure, and, most recently, our growing world-class fibre network. Xplore is a leader in bridging the digital divide in Canada.
3. Xplore has a significant interest in the present proceeding. Xplore holds 89 licences<sup>1</sup> in the 2500-2690 MHz band (“**2500 MHz Band**”) and decisions that may be taken as part of the Consultation could have a material impact on our operations.
4. Xplore has widely deployed our 2500 MHz Band licences across the country, and particularly in New Brunswick, Nova Scotia, Prince Edward Island, Newfoundland, Quebec, Ontario, Manitoba, Saskatchewan and Alberta. Our 2500 MHz Band licences allow us to offer 5G fixed wireless Internet services with download speeds of up to 500 Mbps to hundreds of thousands of Canadian households. Our 2500 MHz Band deployment is directly contributing<sup>2</sup> to the Government of Canada’s objective to connect 100% of Canadian households to high-speed broadband Internet service by 2030.<sup>3</sup>
5. Xplore’s 2500 MHz network has not been significantly impacted by the cross-border interference concerns that the Consultation is seeking to address. Xplore is fortunate that its 2500 MHz Band licences are almost exclusively allocated within the portion of the 2500 MHz Band that has been designated for unpaired TDD service, 2570-2620 MHz (“**Band 38**”). As a result, Xplore has not experienced the widespread interference problems that we understand are hindering the deployment and operation of FDD spectrum in the range 2500-2570 MHz.
6. Nevertheless, Xplore does not object to ISED adopting revisions to the 2500 MHz band plan in order to enable spectrum to be more fully deployed by all carriers to serve Canadians, provided that:

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<sup>1</sup> This includes three licences issued to Corridor Communications Inc. (“**CCI**”). CCI and Xplore Inc. were amalgamated and carried on under the name Xplore Inc. All assets previously held by each company are now held by Xplore Inc.

<sup>2</sup> Xplore, “Xplore Awarded Federal and Provincial Funding to Expand Ultra-Fast Fixed Wireless Internet Across Rural Alberta” (3 February 2026), online: <<https://www.xplore.ca/about/news/xplore-awarded-federal-and-provincial-funding-to-expand-ultra-fast-fixed-wireless-internet-across-rural-alberta/>>.

<sup>3</sup> *High-speed Access for All: Canada’s Connectivity Strategy*, page 5, online: <[https://ised-isde.canada.ca/site/high-speed-internet-canada/sites/default/files/attachments/ISED\\_C\\_19-170\\_Connectivity\\_Strategy\\_E\\_Web.pdf](https://ised-isde.canada.ca/site/high-speed-internet-canada/sites/default/files/attachments/ISED_C_19-170_Connectivity_Strategy_E_Web.pdf)>.

1. No operator loses access to bandwidth as a result of the process (including licensed bandwidth related to spectrum currently designated as a guard band);
  2. A transition to a revised band plan is implemented in a manner that avoids causing service disruptions for Canadians or financial harm to existing operators; and
  3. ISED promotes the contiguous allocation of spectrum and structures the transition to ensure that existing licensees are allocated spectrum following the transition that is no less contiguous than what they hold today.
7. In these Comments, Xplore provides ISED with preliminary input on how a transition to a new band plan should be designed to accommodate investments made by existing operators, minimize service disruptions, and promote long-term benefits for Canadians, should ISED determine that it will revise the 2500 MHz Band to support only unpaired TDD operations.
8. In particular, Xplore submits that the transition must not begin in 2028 as proposed in the Consultation, as this timing does not accommodate operator investment cycles.
9. Xplore is actively investing in new radio equipment to expand and upgrade its 2500 MHz network that would be significantly impacted by a transition occurring as early as 2028. We are deploying new radios in connection with federal/provincial broadband subsidy programs,<sup>4</sup> in order to expand and upgrade our network, and to remove Huawei and ZTE equipment in response to the federal ban on the use this equipment (“**Huawei Decision**”).<sup>5</sup> The radios we are deploying are Ericsson 5G radios that are specifically designed to support TDD operations in Band 38. The radios do not support other frequencies within the 2500 MHz Band. These radios have useful life of at least 10 years.
10. While Xplore strongly supports the re-assignment of frequencies within the 2500 MHz Band to support contiguous allocations to operators, we recognize that in order to achieve this, Band 38 operators, like Xplore, will be required to migrate to use frequencies outside Band 38. This means that we will need to migrate to frequencies not supported by our Ericsson radios, requiring us to replace our newly installed radios with different equipment.
11. Xplore understands that there is significant consensus among FDD operators that the transition should not begin before 2033 given that there are currently no radios certified for use in Canada that support TDD operations across the 2500 MHz Band.
12. While Xplore does not oppose FDD operators converting to TDD operations within their assigned frequencies beginning in 2033, Xplore submits that Band 38 licensees, like Xplore, should be protected from migration outside Band 38 for a period of five years after the

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<sup>4</sup> Xplore, “Xplore Awarded Federal and Provincial Funding to Expand Ultra-Fast Fixed Wireless Internet Across Rural Alberta” (3 February 2026), online: <<https://www.xplore.ca/about/news/xplore-awarded-federal-and-provincial-funding-to-expand-ultra-fast-fixed-wireless-internet-across-rural-alberta/>>.

<sup>5</sup> ISED, *Policy Statement – Securing Canada’s Telecommunications System* (19 May 2022), online: <<https://www.canada.ca/en/innovation-science-economic-development/news/2022/05/policy-statement--securing-canadas-telecommunications-system.html>>.

transition takes places. This protection period is necessary to support the investment cycle associated with our Ericsson radios and to ensure that we are not required to incur costs to replace these radios before the end of their natural life. Once the protection period ends, frequency re-assignments can take place to promote the contiguous allocation of spectrum within the 2500 MHz Band.

13. Xplore supports a phased, market-by-market approach to a transition, with the first market beginning a transition in 2033 and subject to a protection period for Band 38 licensees spanning through 2038. Additional phases should commence in 2035 and 2036 and also be subject to five-year protection periods. Our proposed transition schedule and protection periods are set out in **Table 1** in response to Q2 below.
14. Forcing TDD operators, like Xplore, to migrate outside Band 38 before these protection periods have concluded would require us to replace thousands of radios before their natural end of life in order to maintain service levels for Canadians. The pre-mature replacement of this equipment could cause us to incur additional costs of over \$150 million.
15. Despite these protection periods, operators should remain free to negotiate agreements that enable the early re-allocation of frequencies within specific tier 3 areas in order to promote contiguous frequency assignments.
16. In the remainder of this submission, we have provided more detailed responses to the questions asked by the Department within the Consultation. For unanswered questions, Xplore reserves the right to respond in reply.
17. We thank the Commission for the opportunity to provide these Comments.

## **Responses to Consultation Questions**

### ***Proposal for a new band plan***

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

**In providing comments, respondents are requested to include supporting rationale and arguments.**

#### **RESPONSE:**

18. Xplore supports ISED's proposal to revise the 2500 MHz band plan to an unpaired band plan spanning the entire 2500-2690 MHz frequency range, provided that:

1. ISED ensures that no existing licensee will lose spectrum as a result of a revisions to the 2500 MHz band plan. For clarity, guard band spectrum should be fully considered as part of a licensee's holdings when transitioning to a new 2500 MHz band plan;
2. ISED adopts a transition plan that accommodates the capital investments that we and other Band 38 providers have made to deploy our 2500 MHz Band spectrum and does not require us to replace our current radio equipment prior to the end of its current useful life (as discussed in response to Q2 below); and
3. ISED promotes the contiguous allocation of spectrum and structures the transition to ensure that existing licensees are allocated spectrum following the transition that is no less contiguous than what they hold today (as discussed in response to Q4c below).

19. Xplore understands that, if ISED decides to pursue revisions to the 2500 MHz band plan, ISED intends to hold future consultations to establish the specific design of the new band plan, including establishing block sizes, and to establish a specific transition plan to implement the new band plan.

### ***Considerations on the transition plan to the new proposed band plan – Timing for the transition to the proposed new band plan***

**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.**

**In providing comments, respondents are requested to include supporting rationale and arguments.**

#### **RESPONSE:**

20. Xplore does not support a transition plan that begins in 2028, as this timeline does not accommodate the significant capital investments that Xplore has recently made to expand and upgrade its 2500 MHz network.

21. Xplore has been deploying 2500 MHz Band spectrum since 2015. Today, our 2500 MHz network encompasses more than 2,000 radios deployed across the country and enables us to offer 5G fixed wireless Internet services with speeds of up to 500 Mbps to hundreds of thousands of rural Canadian households.
22. Xplore has undertaken significant financial commitments to expand our network infrastructure. We are currently working in partnership with ISED and the Alberta Ministry of Technology and Innovation to bring 5G services to approximately 250,000 additional households in Alberta. Xplore has committed \$120 million to this work, which will directly leverage our 2500 MHz Band spectrum and entail the deployment of well over 1,000 additional radios.<sup>6</sup>
23. At the same time, we are also undertaking a multi-year project to upgrade our network to 5G technology and replace all of the Huawei and ZTE radios within our 2500 MHz network in response to ISED's Huawei Decision. Our efforts to comply with the Huawei Decision have cost the company more than \$100 million to date and this figure will continue to rise as we replace more radios ahead of the ISED's December 31, 2027, deadline.
24. The radios that Xplore is actively deploying as part of our network upgrade and expansion work are specifically selected 5G Ericsson radios that have been designed to operate TDD frequencies in Band 38. These radios are unable to support frequencies in the broader 2500 MHz Band outside Band 38. These radios have a useful life of at least 10 years.
25. In order to promote the contiguous allocation of spectrum for all licensees as a result of a transition to a new 2500 MHz band plan, existing licensees will be required to migrate to frequencies falling outside Band 38. For Xplore, this means that, in many tiers, we will need to migrate to frequencies not supported by our Ericsson radios either partially or completely. As a result, we will need to replace these radios with new equipment.
26. Xplore understands that there is significant consensus among FDD operators that the transition should not begin before 2033 given that there are currently no radios certified for use in Canada that support TDD operations across the 2500 MHz Band.
27. While Xplore does not oppose FDD operators converting to TDD operations within their assigned frequencies beginning in 2033, Xplore submits that Band 38 licensees, like Xplore, should be protected from migration outside Band 38 for a period of five years after a transition takes place. This protection period is necessary to support the investment cycle associated with our Ericsson radios and to ensure that we are not required to incur costs to replace these radios before the end of their natural life. Once the protection period ends, frequency re-assignments can take place to promote the contiguous allocation of spectrum within the 2500 MHz Band.

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<sup>6</sup> Xplore, "Xplore Awarded Federal and Provincial Funding to Expand Ultra-Fast Fixed Wireless Internet Across Rural Alberta" (3 February 2026), online: <<https://www.xplore.ca/about/news/xplore-awarded-federal-and-provincial-funding-to-expand-ultra-fast-fixed-wireless-internet-across-rural-alberta/>>.

28. Xplore supports a phased, market-by-market approach to a transition, with the first market beginning a transition in 2033 and subject to a protection period for Band 38 licensees spanning through 2038. Our proposed transition schedule and protection periods are set out in **Table 1** below.

**Table 1. Proposed Transition Timeline and Protection Periods for Existing Band 38 TDD Deployments**

Phase #	Geography (Tier 3 areas)	Transition Date	Protection Period for Existing Band 38 TDD Deployments
1	<ul style="list-style-type: none"> <li>Ontario</li> <li>Quebec (minus Gaspé)</li> </ul>	May 1, 2033	April 30, 2038
2	<ul style="list-style-type: none"> <li>Newfoundland and Labrador</li> <li>Nova Scotia</li> <li>Prince Edward Island</li> <li>New Brunswick</li> <li>Quebec (Gaspé only)</li> <li>Manitoba</li> <li>Saskatchewan</li> <li>Alberta</li> <li>British Columbia</li> </ul>	May 1, 2035	April 30, 2040
3	<ul style="list-style-type: none"> <li>Yukon</li> <li>Northwest Territories</li> <li>Nunavut</li> </ul>	May 1, 2036	April 30, 2041

29. Forcing TDD operators, like Xplore, to migrate outside Band 38 before these protection periods would require us to replace more than 3,000 radios before their natural end of life in order to maintain service levels for Canadians. The pre-mature replacement of this equipment could cause us to incur additional costs of over \$150 million.

30. Despite these protection periods, operators should remain free to negotiate agreements that enable the early re-allocation of frequencies within specific tier 3 areas in order to promote contiguous frequency assignments.

***Considerations on the transition plan to the new proposed band plan – Existing 2500 MHz deployment requirements***

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

**In providing comments, respondents are requested to include supporting rationale and arguments.**

**RESPONSE:**

31. Xplore does not object to ISED adjusting existing deployment conditions for licensees that are unable to meet their deployment conditions due to interference-related deployment limitations.
32. That said, Xplore wishes to clarify that any permitted flexibility in meeting deployment conditions will not benefit our business or help us accommodate a transition to a new band plan. Xplore has deployed all of its 2500 MHz Band licences to meet or exceed existing deployment conditions and we are continuing to expand our network in partnership with ISED and the Government of Alberta, as noted above. We must maintain our deployment levels in order to maintain services relied upon by our customers.

***Considerations on the transition plan to the new proposed band plan – Transition plan implementation***

**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?**

**RESPONSE:**

33. Yes, Xplore submits that a transition to a revised 2500 MHz band plan should be implemented on a market-by-market basis across Canada.
34. Operators, like Xplore, will be required to install new radio equipment in order to migrate frequencies, and this work will require significant manual labour and time to complete.
35. Our proposed market-by-market transition timeline is discussed at Q2 and summarized in **Table 1**, above.

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

**RESPONSE:**

36. As noted in response to Q2 above, Xplore submits that existing licensees of Band 38 TDD spectrum should be protected from being required to migrate to frequencies outside Band 38 until the conclusion of a five-year protection period. Our proposed transition timeline and protection periods are summarized in **Table 1** above.
- 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?**



**RESPONSE:**

37. Xplore strongly supports the contiguous allocation of spectrum. Access to contiguous spectrum permits operators to more efficiently and effectively deploy spectrum in order to maximize the benefits that spectrum resources deliver to Canadians, consistent with the objective of the *Spectrum Policy Framework for Canada*.<sup>7</sup> ISED should seek to maximize the extent to which contiguous spectrum can be allocated to operators as part of a transition to new band plan.
38. Xplore understands that the frequency allocations within most tier 3 areas can be arranged to provide all operators with contiguous spectrum based on their current holdings. In light of this, Xplore submits that operators should be permitted to negotiate frequency allocations amongst themselves.
39. Xplore recommends that ISED provide oversight over these negotiations, however, to ensure fair outcomes. We have currently deployed our 2500 MHz network based on a large degree of contiguity and it is essential that this level of contiguity be maintained to not compromise the services we provide to Canadians.
40. In order to promote fair negotiated outcomes, ISED should mandate that all operators are to be allocated an amount of contiguous bandwidth that is no less than what the operator held prior to the transition. To the extent that this is not possible, and parties are not able to agree on new frequency assignments, operators should be able to engage ISED assistance to set frequency assignments.
- d. what is the appropriate tier level for the transition and how might the deployment requirements be adjusted to reflect this?**

**RESPONSE:**

41. Xplore supports a phased implementation based on the timelines and geographic regions summarized in **Table 1** 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?**

**RESPONSE:**

42. Given that Xplore has almost exclusively deployed TDD radios within Band 38, Xplore is not expecting to experience significant interference through the transition process.
- f. are there any other key elements that ISED should consider for a transition plan?**

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<sup>7</sup> ISED, *Spectrum Policy Framework for Canada* (June 2007) at section 4.3.

**RESPONSE:**

43. Xplore has no further comments at this time.

\*\*\*End of document\*\*\*