

25 February 2026

Innovation, Science and Economic Development Canada

Re: Consultation on a Policy, Licensing and Technical Framework for Remotely Piloted Aircraft Systems (RPAS) in the 5030-5091 MHz Band and Certain Bands Used to Provide Commercial Mobile Services¹

Dear ISED,

The GSMA appreciates the opportunity to present our perspectives regarding the proposed licensing and technical framework for Remotely Piloted Aircraft Systems (RPAS).

ISED's *Spectrum Outlook 2023 to 2027* highlights the growing importance of spectrum as an economic driver and enabler of Industry 4.0. Mobile services are consistently at the forefront of enabling innovative technologies, including RPAS.

Canadian mobile network operators have also invested heavily into vital network infrastructure across the country and continue to make mobile services accessible to a greater number of Canadians. Therefore, having sufficient spectrum for mobile continues to be essential for expanding coverage and improving quality of service across the country.

RPAS have the potential to deliver significant socioeconomic benefits. However, this depends on effective authentication, monitoring and connectivity. Mobile networks already provide wide area broadband connectivity and sim cards are a trusted authentication mechanism.

Terrestrial mobile networks can [safely support connectivity](#) at altitudes of at least 400 feet. Mobile operators typically have exclusive access to coverage spectrum (i.e. below 1 GHz) to reliably cover very wide areas and capacity spectrum (i.e. above 1 GHz bands) which supports very fast data speeds.

Taken together this means operators can support very safe, reliable, wide area broadband connectivity for RPAS. This allows RPAS to be monitored, commands to be issued, as well as the ability to carry all types of payloads – ranging from low-data rate telematics to high bandwidth video streaming.

We have responded to questions 27, 28 and 29 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,

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Spectrum Engagement Director
GSMA

¹ The *Canada Gazette*, Part I, December 2025, Consultation on a Policy, Licensing and Technical Framework for Remotely Piloted Aircraft Systems (RPAS) in the 5030-5091 MHz Band and Certain Bands Used to Provide Commercial Mobile Services (SMSE-016-25).

Response to question 27:

ISED is seeking comments on its proposal to modify the CTFA by adding new Canadian footnote CYY, as shown above, to permit RPAS aerial user equipment operations under the mobile service allocations in relevant commercial mobile bands.

The GSMA agrees with the addition of footnote CYY to the CTFA to permit RPAS aerial user equipment operations (CNPC and payload) under the mobile service allocations in the relevant commercial mobile bands. With exclusive access to sub-1 GHz coverage bands and higher-frequency capacity bands, mobile operators can deliver robust broadband links that enable RPAS monitoring, command-and-control, and a full range of payloads, from low-rate telemetry to high-bandwidth video.

Unlike unlicensed spectrum, licensed bands also offer predictable performance and guaranteed quality of service over large areas. Using licensed mobile spectrum also ensures affordability and scalability, thanks to internationally harmonised bands that create global economies of scale.

Response to question 28:

ISED seeks comments on its proposal to permit RPAS aerial UE operations under the existing spectrum licence issued to commercial mobile licensees in specified bands. Third-party operators deploying RPAS services would be subscribers of the commercial mobile operator.

The GSMA supports ISED's proposed licensing framework under paragraph 125 which would permit RPAS operations (CNPC and payload) under the existing spectrum licences issued to commercial mobile licensees in specified bands. This would be an effective solution as no new spectrum licences would be required for the RPAS operator. The GSMA agrees that this option could enable a timely deployment of RPAS, taking advantage of the existing licensing framework and enable effective coexistence of all users.

Mobile network operators have the expertise and capabilities to efficiently manage their licensed spectrum to maximise innovation. Licensed mobile spectrum provides widespread, high-quality connectivity for RPAS, offering both the coverage and capacity needed to support safe, reliable operations and growing data demands. Because mobile networks in licensed bands are already mature and globally deployed, they can support RPAS connectivity today under the right regulation.

Response to question 29:

ISED seeks comments on whether existing conditions of licence applied to commercial mobile licences for the applicable band are sufficient to enable RPAS UE operations.

To realise the benefits outlined above, it is important to avoid imposing unnecessary restrictions on the use of mobile licences for RPAS or reclassifying RPAS connectivity as an aeronautical service, as such actions could limit access to appropriate frequency bands.

A service- and technology-neutral regulatory framework is essential so operators can deploy any mobile technology to support RPAS innovation without constraints. Spectrum licences which are technology specific may limit the ability to provide high speed data connectivity for RPAS, or new IoT-specific cellular technologies that could provide simple narrow-band authentication and identification.