



**ECOTEL**

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**Chantal Davis**

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**Re: Reply comments regarding :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 reply 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. The need for a transition to an unpaired TDD band plan arises primarily from cross-border interference conditions, which materially constrain the effective use of the FDD portion of the BRS band in areas adjacent to the United States (the "affected areas"). These constraints are most acute in regions of high population density, including the Greater Toronto Area (GTA), where spectrum demand is highest and the operational impact is therefore most significant.
3. The resulting limitations on the utilization of the FDD portion of the BRS band disproportionately affect mobile network operators serving these border-adjacent, densely populated markets. As such, the issue is fundamentally regional in nature. ECOTEL respectfully submits that the Department should take this geographic specificity into account when establishing the transition

framework, in order to avoid the application of a uniform, nationwide solution to what is, in essence, a localized operational challenge.

4. SASKTEL meant the same in its submission: “This negative impact, which would be eliminated by this band plan change, does not apply to all operators currently licensed to use this spectrum”
5. Licensees operating outside of the “affected area” can make full use of their spectrum. For them, as expressed by Bragg Communications, the proposed transition to a TDD-only band plan is not justified given the significant capital investments already made in FDD infrastructure, the limited incremental benefits relative to the costs.
6. Outside of the identified “affected areas,” an accelerated transition would necessitate the premature replacement of existing infrastructure that remains within its normal economic and operational lifecycle. Such an outcome would result in inefficient capital deployment and would be inconsistent with the objective of promoting the optimal and sustainable use of spectrum resources.
7. In light of the above, ECOTEL respectfully submits that the Department should defer, to the greatest extent practicable, any mandated transition in areas not subject to the aforementioned interference constraints. In this regard, ECOTEL aligns with the proposal put forward by Bragg Communications Inc., which recommends that any such transition be postponed until the end of the current licence term (2035), thereby allowing existing investments to be fully amortized prior to the implementation of the revised band plan.
8. For the same economic reasons (i.e. avoiding inefficient capital destruction), ECOTEL submits that transitional protection must be granted to existing band 38 operators.
9. ECOTEL reiterates its support for the long-term objective of harmonization and improved spectral efficiency. However, it respectfully submits that a guaranteed transitional protection framework for existing Band 38 (TDD) operators is essential to ensure that the transition is implemented in a fair, efficient, and non-disruptive manner across all classes of licensees.
10. As recognized by multiple respondents, the transition will require large-scale replacement of existing radio infrastructure. For smaller and specialized operators, particularly those already operating in Band 38, this creates a disproportionate burden.
11. Several parties, including regional operators and new entrants, have highlighted the risk of premature equipment replacement and stranded investment if protections are not implemented.

Even large national operators acknowledge that the transition involves replacing tens of thousands of sites and must be carefully phased to align with investment cycles.

12. In this context, Band 38 operators are uniquely exposed. They have already deployed TDD technology aligned with the future band plan, yet they may still be forced into early replacement or relocation in the absence of explicit protection.
13. A time-limited protection period would allow existing assets to reach the end of their useful life, ensuring efficient capital allocation and avoiding regulatory-induced inefficiencies.
14. The Department's policy framework emphasizes maximizing the economic and social benefits of spectrum use. Forcing early unnecessary displacement of operational TDD systems would run counter to this objective.
15. Industry submissions consistently support spectrum contiguity as a long-term goal, but flexibility during transition to accommodate existing deployments. A transitional protection mechanism enables both. It preserves short-term operational efficiency while allowing a planned migration to contiguous assignment over time.
16. Without explicit safeguards, the transition framework risk favoring large, multi-band operators who have access to alternative spectrum band and who can absorb accelerated capital expenditure.
17. By contrast, smaller operators, including rural providers and private network operators, rely heavily of the 2500 MHz band and lack substitute spectrum resources.
18. A guaranteed Band 38 protection window is therefore not preferential treatment, but rather a necessary measure to ensure equitable treatment across heterogeneous operator profiles.
19. ECOTEL recommends that ISED adopt the following measures.
  - Guaranteed protection period (minimum 5 years) for existing Band 38 deployments post transition date
  - Authorization for continued operation within the current band (2575-2615 MHz) within the protection period, even where this may result in temporary non-contiguous block holdings
  - Implementation of a phased reconfiguration process to migrate to final contiguous assignments at the end of the protection window

- Maintenance of interference protection rights for incumbent operations during the transition period

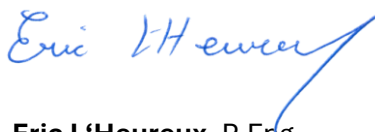
20. There is broad industry alignment on the long-term benefits of a TDD-only band plan. However, there is equally strong recognition that the transition must be orderly, economically efficient and equitable.

21. ECOTEL respectfully submits that such measure (protection of band 38 operator) is both necessary and proportionate to achieve successful transition for all stakeholders.

22. It is critical that ISED retains a central and directive role in defining both the timeline and the transition framework, rather than deferring these decisions entirely to industry coordination. While collaboration among operators is valuable, the structural asymmetry between large national carriers and smaller or specialized operators creates a clear risk that an industry-led process would prioritize efficiency for dominant players at the expense of equitable outcomes. Larger operators possess greater financial flexibility, multi-band spectrum portfolios, and operational leverage, enabling them to absorb accelerated timelines and influence coordination agreements. In contrast, smaller entities, particularly those reliant on Band 38, face materially higher risks of stranded investment, service disruption, and competitive disadvantage. Without firm regulatory guardrails, there is a high likelihood that transition decisions would be optimized for the majority, rather than ensuring fair access, continuity of service, and efficient spectrum use across all operator classes. ISED intervention is therefore essential to establish a predictable, balanced, and enforceable framework that safeguards competition, protects existing deployments, and aligns the transition with broader public-interest objectives.

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

*Sincerely,*



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