



April 28, 2026

spectrumauctions-encheresduspectre@ised-isde.gc.ca

Innovation, Science, and Economic Development Canada  
235 Queen Street  
Ottawa, Ontario  
K1A 0H5

Dear Sir/Madam:

**Re:    *Canada Gazette, Part I, February 14, 2026, Notice No. SPB-002-26 – Consultation on the Revisions to the 2500-2690 MHz Band Plan – Eastlink’s comments***

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Please find attached the reply comments of Bragg Communications Inc., carrying on business as Eastlink ("Eastlink"), in response to Canada Gazette Notice SPB-002-26 – *Consultation on the Revisions to the 2500-2690 MHz Band Plan*.

We appreciate the opportunity to provide our views to the Department.

Sincerely,

A handwritten signature in blue ink that reads "Marielle Wilson". The signature is written in a cursive, flowing style.

Marielle Wilson  
Vice President, Regulatory and Government Affairs

**INNOVATION, SCIENCE, AND ECONOMIC DEVELOPMENT CANADA  
CONSULTATION ON THE REVISIONS TO THE 2500-2690 MHz BAND PLAN  
CANADA GAZETTE, PART I, FEBRUARY 14, 2026, NOTICE NO. SPB-002-26**

**REPLY COMMENTS OF  
BRAGG COMMUNICATIONS INC., OPERATING AS EASTLINK**



**April 28, 2026**

1. Bragg Communications Inc., carrying on business as Eastlink (“Eastlink”), herein provides our reply comments on the issues raised under SPB-002-26 – *Consultation on the Revisions to the 2500-2690 MHz Band Plan* (the “Consultation”).
2. Through the Consultation, Innovation, Science and Economic Development Canada (“ISED”) seeks input on revising the band plan for Broadband Radio Service (BRS) in the 2500-2690 MHz range (referred to as the 2500 MHz band), as well as a preliminary consultation on the transition to a new band plan. The proposed revised band plan would involve transitioning from allowing the deployment of both Frequency Division Duplexing (“FDD”) and Time Division Duplexing (“TDD”) systems, to only allowing the deployment of TDD systems (consistent with the US band plan). The FDD portion of the current band is referred to as band 38; the TDD portions of the current band are referred to as band 7; and the proposed new band is referred to as band 41.
3. In our initial comments, Eastlink highlighted the significant impacts to the industry if ISED transitions to the revised 2500 MHz band plan. Over more than a decade, operators have invested millions of dollars to obtain and install the equipment necessary to deploy our 2500 MHz band, in addition to the substantial engineering efforts involved. If the band plan is revised, significant resources will be wasted as current equipment will need to be replaced before the end of its expected lifespan, and engineering resources will be impacted by the extensive planning and implementation efforts required to coordinate such a large-scale change. All these diverted resources will reduce the capital that otherwise would have been available for investments that further ISED’s policy goals and improve wireless services for Canadians. We have reviewed the interventions of other parties to this Consultation and maintain our opposition to the proposed transition. We reiterate our initial comments that before causing the industry to spend hundreds of millions of dollars and setting back Canadian network investment, alternative long-term solutions to address border interference must be thoroughly explored.
4. From our review of the interventions, it is clear that if ISED proceeds with revising the 2500 MHz band plan, the timing and plan for this transition must account for:
  - The substantial existing capital investments already made in this band, including the lifecycle of equipment.

- The fact that no equipment in the proposed new band plan is currently certified in Canada.
  - The impact on investment plans and the capital required to change existing radios to compatible equipment.
  - The need to adjust the current deployment requirements to ensure that licensees are not required to deploy equipment which would become obsolete in the near-term or during the transition.
  - The need for licensees to have contiguous spectrum.
5. The absence of a reply to other intervenors' submissions should not be construed as agreement with, or acceptance of, their position.

### **Concerns with Transitioning the Band**

6. Eastlink strongly opposes revising the 2500 MHz band to an unpaired band plan due to the substantial operational, financial, and investment impacts. In particular, significant resources will be wasted as equipment will need to be replaced before the end of its expected lifespan. There will also be costs associated with the extensive planning that will be required by our engineering teams and additional co-location and rooftop site costs. All of these added costs will reduce the capital that otherwise would have been allocated to investments that further ISED's policy goals and improve wireless services for Canadians.
7. Although other intervenors supported transitioning the 2500 MHz band to align with the US band plan, they highlighted the challenges and consequences associated with the proposed change:
- Cogeco outlined the disproportionate burden on some carriers, such as Cogeco. As a new entrant Cogeco is actively deploying in the 2500 MHz band to meet the 7-year MVNO mandate and ISED deployment requirements by 2028, using equipment which may soon be rendered obsolete long before its intended lifecycle.<sup>1</sup>
  - TELUS highlighted that the fundamental challenge of this transition is the extensive existing deployments in the band which will mean replacing radio equipment across multiple networks, coordinating timelines across multiple stakeholders, and a need to

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<sup>1</sup> Cogeco Comments, pg 11.

carefully manage the process to avoid service disruptions.<sup>2</sup> They recognized that this transition is “a *complex undertaking involving hundreds of millions of dollars in collective industry costs, including the development of new radio equipment, replacement of existing FDD radios and other operational expenses associated with a truck roll and site works at nearly every site in multiple networks.*”<sup>3</sup>

- Quebecor discussed a preference for a phased approach, noting that this would reduce operational risks and disruption to users.<sup>4</sup>
- SaskTel points out that this will require planning, budgeting, and coordinating across thousands of sites across the country.<sup>5</sup> Further, hardware manufacturers do not have any hardware certified for use in Canada in the proposed new band plan.<sup>6</sup>
- Bell highlighted that this situation is unlike new deployments. It will be resource-intensive, and will require careful planning and coordination across operators to manage the removal of existing in-service equipment, and obtain and install new equipment, all while continuing to maintain service for subscribers.<sup>7</sup>

8. It is clear that transitioning the 2500 MHz band plan would be a massive undertaking for all licensees, and the consequences of this must not be treated lightly.
9. Although Eastlink maintains our opposition to transitioning the 2500 MHz band plan to the US band plan, if ISED proceeds with this transition, the above consequences must be reflected in ISED’s approach. Below we provide further comments in reply regarding the proposed approach to this transition.

## Timeline

10. In the event ISED moves forward with transitioning to an unpaired band plan, Eastlink submits this must be delayed until 2035. Transitioning all of our radio equipment at hundreds of locations across Canada will involve substantial network engineering and will result in

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<sup>2</sup> TELUS Comment, para 8.

<sup>3</sup> TELUS Comment, para 28.

<sup>4</sup> Quebecor Comments, para 11.

<sup>5</sup> SaskTel Comments, para 21.

<sup>6</sup> SaskTel Comments, para 17.

<sup>7</sup> Bell Comments, para 11.

budgetary impacts. Such a delay is appropriate given the scale of the work involved with such a transition.

11. It is clear from the submissions that it would be infeasible to start transitioning the band in 2028. Multiple licensees pointed out that there is no band 41 certified equipment (ie. equipment capable of operating in the entire 2500 MHz using TDD) in Canada, and that the process of developing, testing, and manufacturing sufficient equipment will take a significant amount of time<sup>8</sup>, with TELUS suggesting this will take at least two years.<sup>9</sup> This process beginning is also contingent upon ISED updating the relevant Radio Standards Specification (RSS) and Standard Radio System Plan (SRSP).<sup>10</sup> In addition to the time it will take for certification and manufacturing of compatible equipment there is also the time needed for licensees to reserve sufficient funding to procure and deploy the new equipment<sup>11</sup>, especially to do so in a way which will not impact existing deployments. SaskTel highlighted the potential for loss of network capacity if the band is transitioned before sufficient equipment is available and installed.<sup>12</sup>
12. Bell emphasized the broader context that such a transition would be taking place in - licensees are currently in the process of deploying 3500 MHz and 3800 MHz spectrum. These deployments require significant capital investments, as well as planning, engineering, and operational resources. Adding the redeployment of 2500 MHz spectrum would place significant pressure on budgets and technical resources, disrupting network plans.<sup>13</sup>
13. The vast majority of licensees supported delaying the transition until at least 2033 due to the above noted concerns. Beginning the transition any earlier than 2033 risks there being a lack of available equipment and capital, negatively impacting Canadians' services and licensees' infrastructure investments more broadly.

## Deployment Requirements

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<sup>8</sup> See Bell Comments, para 13; Cogeco Comments, para 6.

<sup>9</sup> TELUS Comments, para 31.

<sup>10</sup> Bell Comments, Para 31.

<sup>11</sup> SaskTel Comments, para 18.

<sup>12</sup> SaskTel Comments, para 18.

<sup>13</sup> Bell Comments, para 14.

14. Eastlink maintains that deployment requirements for the 2500 MHz band must be temporarily suspended. It would be unreasonable to expect operators to continue deploying spectrum in this band over the next few years if that equipment will become incompatible. Licensees will effectively have to re-do all their existing deployments to meet the current population already covered. Many licensees, including Eastlink, have already met or exceeded their deployment requirements, and any challenges we face changing our equipment risks putting us out of compliance.
15. It is clear from the comments on the record that adjustments must be made to deployment requirements in order to prevent wasted investments, inefficient deployment of spectrum, and the corresponding impacts on licensees' financial and operational resources. Cogeco submitted that they received their licenses through a residual auction and are actively working to meet 2028 deployment requirements: all of this equipment will become obsolete if the band transitions.<sup>14</sup> Xplore is actively expanding in this band in partnership with ISED and the Government of Alberta as part of funding awarded to improve high-speed internet access in rural Canada.<sup>15</sup> As further pointed out by Bell, maintaining these deployment requirements will disrupt operators' very ability to transition to a new band plan if mandated: *"Directing capital toward Band 7 or Band 38 deployments that will soon be rendered obsolete would represent an inefficient use of resources that could otherwise be directed toward new Band 41 infrastructure."*<sup>16</sup>
16. We strongly agree with Cogeco and Quebecor that deployment requirements must be placed on hold from the date of ISED's decision on this Consultation, continuing through the transition and for 5 years post transition.<sup>17</sup> This together with a later start time as outlined above will avoid significant wasted resources that do not align with long-term objectives of efficient spectrum use and improving connectivity for Canadians. As well-articulated by Ecotel:

*From a regulatory and investment-efficiency standpoint, maintaining existing deployment obligations after such an announcement [of a decision to transition the band] would create a structural misalignment between regulatory compliance and rational capital allocation.*

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<sup>14</sup> Cogeco Comments, pg 3.

<sup>15</sup> Xplore Comments, para 4.

<sup>16</sup> Bell Comments, para 18.

<sup>17</sup> Cogeco Comments, pg 3; Quebecor Comments, para 8.

*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.*<sup>18</sup>

17. All licensees will remain motivated to deploy this spectrum even with deployment requirements temporarily suspended. Licensees with existing deployments will be motivated to complete the transition as efficiently as possible to ensure continuity of service and minimize service impacts on customers, and any licensees currently working to meet deployment requirements will simply be given an appropriately longer period to do so.
18. Overall, licensees generally agreed with, or did not oppose, some degree of relaxation or adjustments of deployment requirements. Therefore, the suspension of deployments requirements from the announcement of a plan to transition the band (if this occurs) to 5 years post-transition is appropriate to account for the unique challenges of some licensees, as well as equipment lifecycles.

### **Transition Plan Implementation**

19. Although Eastlink opposes transitioning to an unpaired plan for the 2500 MHz band, if ISED proceeds to do so, we are in favor of a phased approach that prioritizes licensed areas experiencing interference issues. Our preference is for licensees to have contiguous blocks of spectrum in the new band, the required redistribution of which can be coordinated among licensees or directed by ISED as needed.
20. It is clear from the comments that licensees generally agree that:
  - The transition should follow a phased approach;
  - Certain portions of the band should not be prioritized first during the transition<sup>19</sup>; and

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<sup>18</sup> Ecotel Comments, para 19.

<sup>19</sup> As detailed by intervenors such as Cogeco (at page 8) and Rogers (at paras 64-65), this option was considered but rejected during industry group discussions



- Licensees prefer having contiguous blocks of spectrum as a result of the transition due to the associated increased functionality and use cases.

21. Generally, the comments indicate licensees favor a licensee-led transition process regarding what areas to transition, when, and what interference mitigation measures to implement, with others adding that ISED should be involved to assist as-needed.<sup>20</sup> We agree that it is necessary for licensees to be involved in establishing the transition process in order to account for licensees' unique networks and circumstances. As outlined by Rogers: "[...] *Network financial budgeting is typically considered over long cycles, such as 10-years. Therefore, there must be an understanding that industry stakeholders, both large and small, require full and direct input into the planning and execution of this proposed migration. Failure to consider industry inputs could be harmful to the financial health of these organizations, particularly smaller operators [...]*".<sup>21</sup> However, general oversight and input by ISED, is necessary to ensure a fair and equitable transition process. The unique challenges of all licensees, particularly smaller and regional licensees, must be accounted for and addressed to the greatest extent possible. ISED's involvement as a neutral third party with the ability to make determinations is the most appropriate way to address any disputes and ensure that all licensees' circumstances are considered equitably in a transition process.

22. None of the licensees disagreed with taking a phased approach to the transition. We note that while multiple licensees proposed a phased approach based on groups of provinces, we believe Ecotel's proposed approach is worth exploring. Like Ecotel, Eastlink's network has not been impacted by the interference issues near the Canada/US border. Ecotel described the issue this Consultation seeks to address as an "urban-centric" problem, and as a result the unimpacted areas should have a later transition.<sup>22</sup> Ecotel therefore proposes that instead of using specific ISED tier areas or provinces, transition areas could be established based on the actual location of stations registered in ISED's SMS database.<sup>23</sup> We believe it is worth discussing among licensees whether this approach may be more appropriate than a province-based approach.

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<sup>20</sup> See for example: Bell Comments, paras 17, 30, and 32; Xplore Comments, para 40.

<sup>21</sup> Rogers Comments, para 43.

<sup>22</sup> Ecotel Comments, para 15.

<sup>23</sup> Ecotel Comments, paras 30-31.

23. We anticipate ISED's involvement in the transition process will be most critical in the reassignment of spectrum licensees to allow licensees to have contiguous blocks. The intervening licensees unanimously agreed that if the band transitions, licensees should have contiguous blocks of spectrum. We agree with the caveat raised that licensees must not lose access to their current bandwidth.<sup>24</sup> Although TELUS suggests using an interim licensing regime in order to address issues such as different license terms and fees as part of the spectrum redistribution<sup>25</sup>, we have concerns with this approach. It risks adding unnecessary complexity to what is already a massively complex undertaking by the industry. The issues of differing license terms and fees raised by TELUS highlight that it is likely more appropriate for ISED to aid in coordinating the reallocation of spectrum licenses, in order to ensure these issues are accounted for in supporting equitable transfers.
24. Rogers proposes that reassignment of spectrum to provide licensees with spectrum in contiguous blocks could occur by following the assignment process from auctions.<sup>26</sup> If we have understood their proposal correctly, all licensees will automatically receive contiguous blocks in the band in their current tier areas, but licensees would need to bid if they wanted specific frequencies. We have concerns with the suggestion that licensees who may currently hold specific frequencies they wish to keep would risk losing those by bidding at an auction. We further strongly oppose any need for licensees to pay additional bidding fees simply to be able to maintain their current spectrum holdings.
25. Some licensees described that the band in a particular area must transition by an overnight flash cut.<sup>27</sup> While we agree that this would help mitigate interference issues between Canadian operators, we highlight the additional costs this approach entails for operators. Leading up to the transition date, operators would need to send personnel to locations across the country to deploy (but not turn on) the new equipment. This would at least double any co-location or rooftop site fees while both the old and new equipment are at the site. The new equipment may also be unused for an extended period of time due to the length of time it takes to deploy the equipment, increasing the risk of equipment issues when the flash cut occurs. Personnel will then need to be sent back to all of these sites to remove old equipment. While ultimately

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<sup>24</sup> See for example: Xplore Comments, para 6.

<sup>25</sup> TELUS Comments, paras 41-44.

<sup>26</sup> Rogers Comments, para E7.

<sup>27</sup> See for example: Rogers Comments, paras 23-25.

licensees may determine an overnight flash cut is the best approach, we believe it is important for ISED to be aware of these additional complexities and costs.

26. Eastlink maintains that if ISED proceeds with transitioning the 2500 MHz band plan, a phased approach must be developed with input from all licensees. It is also clear from the issues raised in this Consultation that this is a highly complex undertaking, and additional discussions among licensees and ISED will need to occur in order to address in detail the wide array of competing issues and operational challenges of the proposed transition.

## **Other**

27. In their comments Rogers suggests that ISED auction the currently unassigned restricted guard bands (2570-2575 MHz and 2615-2620 MHz).<sup>28</sup> While we do not take issue with auctioning that spectrum, such a discussion is premature. Any auction of residual currently unassigned spectrum must not occur until after all current licensees have been reassigned contiguous blocks in a manner that ensures no licensees lose access to their current bandwidth.

## **Conclusion**

28. The proposed transition of the 2500 MHz spectrum to a new band plan would be highly disruptive to the industry. Capital and engineering resources would need to be allocated to a complex, multi-year replacement of existing equipment across Canada in a manner that does not negatively impact subscribers' service. It risks wasting substantial resources, and diverting capital away from meeting other spectrum deployment requirements and improving wireless services for Canadians. If, despite these consequences, ISED proceeds to transition the 2500 MHz band, it must be approached with careful consideration to minimize the operational and financial impacts on licensees, and consequent impacts on the efficient use of spectrum and advancement of the Canadian wireless services industry.

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<sup>28</sup> Rogers Comments, para E6.