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April 28, 2026

via email: [spectrumauctions-encheresduspectre@ised-isde.gc.ca](mailto:spectrumauctions-encheresduspectre@ised-isde.gc.ca)

Chantal Davis  
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235 Queen Street  
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**Re: Canada Gazette, SPB-002-26: Consultation on the Revisions to the 2500-2690 MHz Band Plan**

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Ms. Davis,

Attached, please find Reply Comments from Rogers Communications Canada Inc. (Rogers) in response to *SPB-002-26: Consultation on the Revisions to the 2500-2690 MHz Band Plan*, published in the Canada Gazette, Part I, February 14, 2026. Rogers files these comments in reply to Comments filed by other parties and posted on the Innovation, Science and Economic Development Canada website on April 2, 2026.

Rogers thanks the Department for the opportunity to provide input on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Howard Slawner', with a stylized flourish at the end.

Howard Slawner  
Vice President - Telecom  
HS/pg

Attach.

Consultation on the Revisions to the  
2500-2690 MHz Band Plan  
SPB-002-26

Reply Comments of  
Rogers Communications Canada Inc.  
April 28, 2026



## Executive Summary

- E1. Nearly all industry stakeholders are broadly supportive of Innovation, Science and Economic Development Canada's (ISED or the Department) proposals to revise the band plan for the Canadian Broadband Radio Service band. Rogers continues to support revising the band from mixed Frequency Division Duplex (FDD) and Time Division Duplex (TDD) to TDD-only, as it will provide network operators in Canada (and the United States) greater flexibility to deal with the increasingly challenging cross-border coordination. The only operator to provide any level of opposition to the transition is Eastlink, however, they are one of the only licensees to not have been directly impacted by interference. It should be noted, however, that several operators that have also not been significantly impacted (e.g., SaskTel, Ecotel, etc.) are all largely supportive. Beyond cross-border coexistence, an all TDD band can maximize the spectral efficiency of the band long-term for everyone (including Eastlink) as operators look to transition the band from 4th Generation to 5th Generation (and future) radio networks, benefiting Canadian consumers and the broader economy.
- E2. Further, most commenters are aligned with the industry-developed proposal to implement a transition process that is completed in three distinct zones, with the actual transition to start in 2033, with some expressing minor variations. We continue to highlight that facilities-based operators will be required to transition (or consolidate) over 18,000 sites operating across the country using the current Broadband Radio Service band plan. The Broadband Radio Service band is currently, and will continue to be, heavily used by both mobile and fixed wireless Internet Canadian consumers, and licensees are unanimous in their recommendations to minimize any operational impairments owing to the transition. As such, Rogers continues to recommend the transition to a revised band plan should be structured as follows.
- **Zone 1** – Ontario/Québec with the Atlantic portion of Gaspé peninsula excluded; cut-over transition date: **May 2033**
  - **Zone 2** – British Columbia, Alberta, Saskatchewan, Manitoba, New Brunswick, Nova Scotia, Prince Edward Island, Newfoundland and Labrador, plus the Atlantic portion of the Gaspé peninsula of Québec; cut-over transition date: **May 2035**
  - **Zone 3** – Nunavut, Northwest Territories and Yukon; cut-over transition date: **May 2036**
- E3. Broadband Radio Service licensees also appear unanimous in their support to create contiguous spectrum holdings for licensees to justify the investments by

Canadian facilities-based operators to transition to the revised band plan. Some current-TDD licensees, as well as those in rural or remote areas, do request some preferential treatment or longer timelines to accommodate frequency re-assignment. The Department should give consideration to longer timelines in rural and remote areas, provided all impacted licensees agree, but we continue to recommend that urban areas be made contiguous as of the transition date.

- E4. In addition to support for potentially longer transition timelines in rural and remote areas, there appears to be consensus that the Department should also allow for relaxation of deployment requirements (enforcement) both prior to and for five years following the transition to the new band plan. This view is shared by operators like Rogers that are already fully compliant, as well as by those that have yet to achieve upcoming requirements. It is clear that Canadians will benefit more from an orderly transition to the new band plan than strict enforcement of deployment requirement using a band plan that will be sunsetted in a few years. It is no one's interest to require significant further investment in radio deployments that will be stranded in only a few years.
- E5. Finally, as the Department begins to look ahead to the next consultation on a detailed new band plan for the Broadband Radio Service band, it should also take the opportunity to consult on a licensing policy for the currently restricted intra-band guard band holdings. We continue to recommend a competitive auction process for any unassigned spectrum, as well as including any assigned guard band, to make a 10 MHz TDD block available for auction at the Tier 3 licence area across the country. Further, the Department should give consideration to Telus' proposal to fully align with the United States band plan and extend down to 2496 MHz and license a 2496-2500 MHz block. As part of the licensing of restricted TDD spectrum, the Department should adopt a similar assignment round structure to the 3500 MHz band, where all existing and transition 2500 MHz band holdings would be put into the auction assignment round, with rules to fully support contiguous assignments.
- E6. A 2033 transition date for Zone 1 will allow for sufficient time to consult on a detailed band plan and any required technical regulations for equipment, while also providing sufficient time to consult on – and conduct – a competitive process for any new, unassigned, or currently restricted Broadband Radio Service spectrum. By making additional mid-band spectrum available for facilities-based operators while making all current and future holdings fully contiguous within the revised band plan, the Department will successfully maximize the economic and social benefits that Canadians derive from the use of radio frequency spectrum.

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## Introduction

1. Rogers Communications Canada Inc. (Rogers) welcomes the opportunity to reply to comments filed by other parties in response to *SPB-002-26: Consultation on the Revisions to the 2500-2690 MHz Band Plan*<sup>1</sup> (the Consultation), posted on the Innovation, Science and Economic Development Canada (ISED or the Department) website on April 2, 2026.
2. There is broad recognition from stakeholders that the Consultation's proposals to revise the band plan for the 2500-2690 MHz range (referred to as the 2500 MHz band) is necessary to provide Canadian and United States (U.S.) network operators greater flexibility to deal with the increasingly challenging cross-border coordination and coexistence issues. Indeed, only a single licensee – Eastlink, a regional incumbent that has not been materially impacted to-date – offers any level of objection, and even they are ultimately aligned with the industry-led transition plan. Numerous commenters similarly highlight that revising the Canadian 2500 MHz band from mixed Frequency Division Duplex (FDD) and Time Division Duplex (TDD) to TDD-only will maximize the spectral efficiency of the band long-term as operators transition from 4th Generation (4G) Long Term Evolution (LTE) to 5th Generation (5G) New Radio (NR) network systems.
3. There are several important reasons for adopting this transition in the Broadband Radio Service (BRS) band, including cross-border coexistence, equipment benefits (both infrastructure and handsets), and spectral efficiency gains from defragmentation. Indeed, most stakeholders are also strongly aligned on the band plan transition must be accompanied by the re-assignment to create contiguous spectrum holdings for licensees to justify the significant investments by Canadian facilities-based operators. While operators may be able to temporarily manage fragmented spectrum in rural areas for an extended transition period, all urban areas must be fully contiguous at transition. Without the spectral and deployment efficiency gains resulting from fully contiguous spectrum, the incentive for operators to invest in deploying new base station radios across the country is much diminished.
4. There is also a general consensus that the Department should adopt a transition process that is completed in three stages/zones, with the actual transitions to start later than the 2028 date initially proposed in the Consultation. Although there is some minor variance in preferences expressed by some parties for the start date

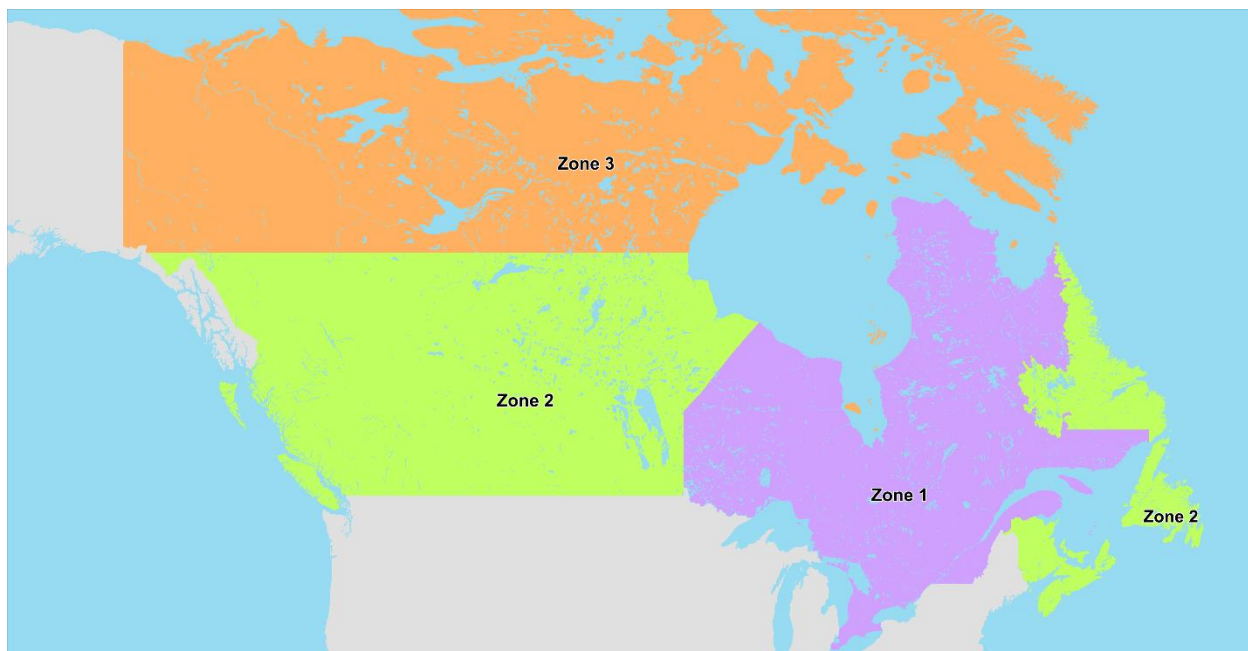
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<sup>1</sup> ISED, *SPB-002-26: Consultation on the Revisions to the 2500-2690 MHz Band Plan* (Consultation); <https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/learn-more/key-documents/consultations/consultation-revisions-2500-2690-mhz-band-plan>.

and specific transition zones, we note there is majority support for the industry-defined three zones with the first stage of the transition to take place in 2033. This transition start date will provide operators with sufficient time to manage the costs and resources to deploy new radios, while also not unduly delaying the transition and unnecessarily increasing the challenges of cross-border coordination. This transition timeline should be accompanied by the relaxation of deployment requirements both prior to and for five years following the transition to the new band plan. While operators should be required to fully meet their deployment requirements, some flexibility may be required to facilitate a successful transition and is in the best long-term interests of Canadian wireless consumers.

5. As detailed in our comments, we continue to support the industry-led proposal for the first stage of the transition should take place in 2033, Zone 1. This would include Ontario and most of Québec, with the Atlantic portion of Gaspé peninsula excluded. Zone 2's transition would take place in 2035, and include British Columbia, Alberta, Saskatchewan, Manitoba, New Brunswick, Nova Scotia, Prince Edward Island, Newfoundland and Labrador, plus the Atlantic portion of the Gaspé peninsula of Québec. The final stage, Zone 3 covering Nunavut, Northwest Territories and Yukon would be scheduled for 2036.

**Figure 1. Proposed 3-Zone Transition Map**



6. Again, while minor variances in timing preferences for the transition do exist, Rogers provides the most robust milestone details to support our recommendation of the industry-proposed timelines. We assume the Department consults on and

publishes a final band plan decision by mid-2027 and publishes updated technical standards for the revised band plan sometime in late 2027. This gives facilities-based operators a year (2028) to work with equipment suppliers to ensure base stations (and handsets) are compliant with Canadian regulations and ready for ISED-certification, with wide-scale deployments to begin in operators' 2029 build-cycle. The first actual transition date would take place in 2033, providing sufficient time for larger operators to deploy to their larger number of sites across the country and respect the resource constraints for smaller operators to deploy within their networks. It also ensures most Canadians will already have handsets that can fully access the new Canadian band plan through natural consumer upgrade cycles. It also provides operators big and small sufficient time to manage the capital investments required to replace radios in a band that delivers significant wireless capacity to Canadian consumers.

7. Based on all the things that must be completed prior to transition on both the regulatory side (e.g., consulting on and publishing a finalized band plan, updating technical regulations, certification of Canadian equipment) and the operator side (acquiring and deploying new radios for over 18,000 sites, coordinating the cut-over transition timing), it is clear that 2028 is not a realistic transition date. Conversely, extending the transition period start/end date nearly 15 years out would significantly impair the spectrum in some of Canada's most populous regions. Through careful and coordinated planning, network operators can successfully manage the proposed migration for the benefit of Canadian mobile customers, but only if the proposed transition timelines and other considerations are respected.

### **Auctioning Unassigned BRS Spectrum**

8. In their comments, Telus proposes that ISED adopt a defined TDD band plan that, "similar to the U.S. should include the frequencies 2496-2500 MHz",<sup>2</sup> as well as harmonizing with their technical standards to maximize equipment availability and cross-border coexistence. There is merit to this proposal and we recommend that the Department include consideration of adding this spectrum as part of the future consultation to determine the detailed band plan, establishing block sizes.<sup>3</sup> Telus is, however, silent on how this new 4 MHz of spectrum would be assigned.
9. Rogers submits that this additional spectrum for the BRS range could be made available in a competitive licensing process along with the currently unassigned restricted guard band holdings, as we propose in our comments. We also continue

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<sup>2</sup> Telus Comments, para 9.

<sup>3</sup> ISED, *Consultation*, para 15.



to recommend the Department include any assigned guard band spectrum to make a 10 MHz TDD block available for auction at the Tier 3 licence area across the country. We note that Telus has also proposed a 10 MHz block band plan, noting the exception of the new 2496-2500 MHz, at a Tier 3 level, with Telus also stating that “ISED’s policy decision does not need to assign the 2496-2500 MHz spectrum as a precondition for rebanding.”<sup>4</sup>

10. Rogers continues to recommend that the Department adopt a similar assignment round structure to the 3500 MHz band, where all existing and transition 2500 MHz band holdings would be put into the assignment round. A licensee’s holdings would be made contiguous by default (including any transition and auction holdings). This will allow licensees to express a preference for specific frequency ranges, while those who do not wish to bid can still be accommodated in the new band plan with fully contiguous holdings. Such a policy outcome would support the Department in achieving the objectives of the *Spectrum Policy Framework for Canada*, “to maximize the economic and social benefits that Canadians derive from the use of the radio frequency spectrum resource”.<sup>5</sup>
11. We continue to see that the industry-proposed transition date of the first actual cut-over in 2033 will provide the Department with more than sufficient time to have a licensing policy consultation and run a competitive auction for the current BRS 2500 MHz intra-guard band TDD spectrum, as well as the potential additional spectrum at the bottom of the band.
12. Irregardless of any decision regarding currently assigned restricted 2500 MHz TDD holdings, we highlight in our comments that is currently nearly 300 million MHzPops of unassigned TDD spectrum in Canada, including 10 MHz of unassigned TDD spectrum in some of Canada’s largest markets, including 3-025 Toronto, 3-013 Montreal, 3-052 Vancouver, and 3-015 Ottawa. Should the 2496-2500 MHz spectrum be added to a new Canadian BRS band, that increases the amount of unassigned spectrum to over 437 million MHzPops. This is even more total mid-band spectrum that could be made available to network operators in the revised band plan in order to further enhance mobile service experience for Canadians across the country, and support additional economic efficiency growth.
13. Requiring all current BRS spectrum licensees (both FDD and TDD) to potentially receive reassigned frequencies could help ensure all parties acquire contiguous spectrum but may be opposed by some TDD licensees who have deployed equipment that is not sufficiently frequency agile across the entire future BRS

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<sup>4</sup> Telus Comments, para 32 footnote.

<sup>5</sup> ISED, *Consultation*, para 5.

spectrum band. Indeed, some of those operators propose longer timelines to transition or preferential access to the existing TDD frequency ranges in the new band plan. However, we continue to highlight that those operators who desire to continue using their Band 38 equipment can bid for their preferred frequencies.

14. For certainty, regardless of any decision around the return of restricted TDD spectrum to be re-licensed through a competitive process or the licensing of any currently unassigned spectrum in the current or future BRS band plan, all licensees should be required to be subject to the reassignment of frequencies across the entire new TDD band plan. This will ensure that all licensees post-transition fully benefit from contiguous spectrum. Furthermore, while some mutually-agreeable extended transition periods may be workable in rural and remote areas, urban areas should be made fully contiguous as of the transition cut-over date.
15. The remainder of Rogers' comments respond to the specific issues raised in the Consultation.

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.

16. There is broad, cross-industry support from nearly every stakeholder for the Consultation proposal to revise the BRS band plan to an unpaired band plan in 2500-2690 MHz, with the exception of Eastlink. We acknowledge Eastlink's views that shifting to an unpaired band plan will have "substantial operational, financial, and investment impacts on operators."<sup>6</sup> However, it must be noted that, to date, Eastlink has faced little, if any, cross-border interference issues resulting in impairment – both risks and actual – to spectrum in some of Canada's populous regions. They also do not acknowledge the long-term technical benefits for all network operations that can be found from the transition, including themselves.
17. Therefore, Eastlink's reluctant acceptance of the proposal seems somewhat self-serving, particularly contrasted with other operators that are not significantly impacted by the cross-order interference. Indeed, Ecotel, a BRS 2500 MHz licensee primarily operating Wireless Private Networks in remote areas, states:

ECOTEL recognizes that the proposal to transition the BRS band an TDD-only use has become **unavoidable** since the current interference issues with US carriers' stations operating near the border is rendering the FDD portion (B7) of the band **unusable** by Canadian operators. This problem is further exacerbated by the fact that it occurs within the **most densely populated regions** of the country where traffic demands is higher. For that reason, ECOTEL agrees with ISED's proposed band plan revision.

ECOTEL also sees the **benefit of using TDD in densely populated areas** where smaller cell range and reduced time delays are suitable for more spectrally efficient radio interface techniques such as Massive-MIMO (M-MIMO).<sup>7</sup> [Emphasis added.]

18. Although Eastlink does register their opposition to the proposed band plan transition, while also generally aligning with the high-level, industry consensus transition plan, all other stakeholders – including all other BRS licensees

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<sup>6</sup> Eastlink Comments, para 8.

<sup>7</sup> Ecotel Comments, para 13-14.

participating, such as Bell, Cogeco, Ecotel, SaskTel, Telus, and Xplore – are generally supportive of the transition. They also align with the Rogers' view that Canadian network operators can successfully manage the proposed migration for the benefit of Canadian customers but only if the proposed transition timelines and investment considerations are respected.

19. We reiterate that Rogers' support of the proposal is contingent on licensees receiving fully contiguous spectrum in all licence areas after the band has transitioned. While operators may be able to temporarily manage fragmented spectrum in rural areas for an extended transition period, all urban areas must be fully contiguous at transition. This approach will improve the economics of a transition of this magnitude, allowing all licensees to fully benefit from efficiency gains in both handsets and base stations.

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.

20. With some relatively minor exceptions, there appears to be a near-consensus for the industry-led plan for transition to occur in three zones with the transition to the new band plan in May 2033 for Zone 1, May 2035 for Zone 2, and 2036 for Zone 3. In addition to Rogers, this plan is fully supported by Bell, Quebecor, SaskTel, and Telus.<sup>8</sup> Most other parties are broadly aligned, with Xplore supporting the 2033 transition date with some additional protections for Band 38 licensees and Ecotel suggesting a 2034 start date and slightly longer process. Eastlink suggests that the transition should not start until 2035;<sup>9</sup> however, it should be noted that the majority of their BRS spectrum (over 90% of their holdings by MHzPops) is within the proposed Zone 2, i.e., accommodating their preferred 2035 date. Cogeco prefers to transition earlier but ultimately supports the industry-proposed timing, provided there is an ability for early utilization of Band 41-capable radio equipment and a relaxation of any 2028 deployment requirements.<sup>10</sup>
21. The industry-proposed timeline of starting in 2033 and taking place over four years provides network operators with sufficient time to plan for and deploy the new band

<sup>8</sup> Bell Comments, para 15; Quebecor Comments, para 7; SaskTel Comments, para 17; Telus Comments, para 37.

<sup>9</sup> Eastlink Comments, para 12.

<sup>10</sup> Cogeco Comments, pg 5.

plan. We believe this industry-led plan will also effectively accommodate the minor deviations raised by other licensees.

22. As noted, Eastlink has proposed a transition date of 2035, which aligns with over 90% of their 2500 MHz holdings by MHzPops. While the industry-led start date of 2033 would capture two of Eastlink's licences, our review of the ISED SMS licensing database suggests that would be a slightly earlier transition for just eight (8) total Eastlink sites across both licences,<sup>11</sup> which should be manageable. Regarding Xplore and Ecotel's request for additional time for transition in rural and remote areas, we continue to support the potential for temporarily managing fragmented spectrum in rural areas for an extended transition period, provided that all urban areas are fully contiguous at transition. We also generally support Cogeco's request for early Band 41 TDD deployments, provided that existing Band 7 FDD deployments are protected prior to the transition dates.
23. Rogers' continued recommendation is for the Department to work with all licensees and formally adopt the proposed schedule as discussed in the industry work-group, including the proposed transition timelines of Zone 1 in May 2033, Zone 2 in May 2035, and Zone 3 in May 2036. Again, this timeline assumes a final band plan and revised RSS-199 is published sometime in 2027 to allow sufficient time to work with equipment suppliers on the new Canadian BRS 2500 MHz band ecosystem.

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

24. There appears to be broad consensus supporting the adjustment of any deployment requirements needed should a licensee not be able to fully use their spectrum due to cross-border interference, including as the result of any voluntary coordination agreements with Canadian or U.S. operators needed to maximize spectrum utilization in border areas. There is also corresponding support for the relaxation of deployment requirements following the transition to the new band plan.
25. Rogers remains supportive of any deployment requirements adjustments whereby some specific coverage may be reduced prior to transition timelines owing to technical or licensing coordination challenges. While there are some differences in

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<sup>11</sup> A review of ISED SMS site data reviewed in April 2026 suggests Eastlink has deployed seven (7) sites linked to 010286621-003 3-036 Sudbury and just one (1) linked to 010285317-003 3-037 Kirkland Lake.

terms of how exactly to modify either requirements themselves or how to adjudicate them, we continue to recommend a grace period of five years (5-years) after the transition date for each zone as a fair and reasonable approach. However, to ensure a successful migration by all operators, we have no objections to the Department adopting requests by other operators for more permissive relaxation of requirements, provided they are equally applied to all licensees.

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?
- b. should certain portions of the band, such as the Canadian FDD uplink spectrum, be prioritized first during the transition?
- 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?
- d. what is the appropriate tier level for the transition and how might the deployment requirements be adjusted to reflect this?
- 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?
- f. are there any other key elements that ISED should consider for a transition plan?

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

#### **Q4 a. Transition market/region strategy**

26. Most comments are aligned with the industry-led proposal of dividing Canada into three geographic divisions as the appropriate strategy.

- **Zone 1 (May 2033)** – Ontario/Québec with the Atlantic portion of Gaspé peninsula excluded.
- **Zone 2 (May 2035)** – British Columbia, Alberta, Saskatchewan, Manitoba, New Brunswick, Nova Scotia, Prince Edward Island, Newfoundland and Labrador, plus the Atlantic portion of the Gaspé peninsula of Québec

▪ **Zone 3 (May 2036) – Nunavut, Northwest Territories and Yukon**

27. Although we support these dates as the transition timeline, we believe that sites in remote areas should be allowed to continue operating on a no interference, no protection basis with the agreement of any (potentially) impacted licensees.

28. The Department should not adopt proposals to transition earlier (e.g., Cogeco) or later and with more groupings (e.g. Ecotel), as this will make the transition more challenging. Assuming ISED is able to progress with their follow-on consultation to finalize the new band plan and complete technical consultations with industry to create updated equipment standards by mid-2027, that is simply insufficient time for vendors to build and certify Canadian specific equipment and have network operators redeploy across the country for a band that is heavily in use. We note Cogeco appears to have only 33 BRS 2500 MHz sites currently deployed. The original national operators, combined, have nearly 13,000 sites deployed – with newly near-national Quebecor at more than 1,500 sites themselves.<sup>12</sup> Cogeco's rushed timeline is only feasible for themselves and not in the interest of Canadian wireless consumers. Ecotel's proposal to add more zones would also unduly complicate transitions, while also unnecessarily extending the time required. Any such proposed timelines should be rejected by the Department.

**Q4 b. Prioritization of certain portions of the band**

29. There appears to be no support for prioritization of certain portions of the band, including the Canadian FDD uplink spectrum. As we note in our comments, managing a downlink-only configuration for FDD, plus a narrow TDD channel simultaneously, would result in significant network capacity impairment for some period of time. Among those who address Q4b, the most optimal option is the Rogers recommendation to maintain the current band plan right up until the transition and then to immediately migrate to the new band plan (i.e., a large-scale, single-night cut-over).

**Q4 c. Contiguous blocks / frequency assignment process**

30. All comments appear to support the (long-term) complete defragmentation of the BRS 2500 MHz spectrum band in order to provide fully contiguous assignments. Some parties recommend additional transition time for current BRS 2500 MHz TDD licensees, while others generally request extended time for rural or remote sites.

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<sup>12</sup> As per a review of ISED SMS site data in March 2026.

31. While Rogers continues to believe that there may be some flexibility to provide a slightly extended transition period in remote areas, all urban BRS 2500 MHz spectrum would need to be fully contiguous as of the cut-over transition date. Without this important benefit, the business case for proceeding with this transition would change significantly.
32. Further, we continue to recommend a competitive process for frequency assignments that includes auctioning unassigned 2500 MHz spectrum, similar to the Department's own policy for the 3500 MHz transition process. This process appears to be the ideal solution to create contiguous holdings and maximize the economic and social benefits that Canadians derive from the use of the radio frequency spectrum resource.

#### **Q4 d. Appropriate tier level for the transition**

33. We continue to recommend that the Tier 3 level be used for transitions. Similar to Bell, we recommend that the transition process follow the geographic areas and the corresponding Tier licence areas aligning with the industry-proposed 3 zone structure. "To the extent a spectrum licence Tier is split between two areas with different transition deadlines, then this can be managed through temporary authorizations from ISED as required."<sup>13</sup>

#### **Q4 e. Potential technical requirements during transition period**

34. We agree with Bell, who makes a similar recommendation as ourselves, that ISED finalize updates to the relevant RSS and SRSP documents for the band at the earliest opportunity, so that Band 41 equipment can be certified in Canada. We also support their recommendation that the technical parameters for the new band plan equipment harmonize, to the greatest extent possible, with those in the US, to enable Canadian mobile network operators to benefit from economies-of-scale.<sup>14</sup>

#### **Q4 f. Any other key elements that ISED should consider for a transition plan**

35. Eastlink highlights that there is potential interference and quality of service impacts for consumers during the transition and, as such they "reiterate that alternative measures to address interference along the US border should be investigated."<sup>15</sup> The Department is well aware of the history of the cross-border interference, and as we and numerous other stakeholders document in our comments, the issue has been investigated in good faith by operators and regulators on both sides of the

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<sup>13</sup> Bell Comments, para 28.

<sup>14</sup> Bell Comments, para 31.

<sup>15</sup> Eastlink Comments, para 21.



border since 2014. However, despite the efforts of all parties, the issue has only increased in severity as Canadian and U.S. operators are both looking to deploy the spectrum more intensely for the benefit of consumers on both sides of the border.

36. A change in Canadian band plans has been an option of last resort. That Eastlink has not been materially impacted to date should not in anyway discount the significant efforts and sacrifices that impacted Canadian (and U.S.) carriers have made to manage cross-border interference for more than a decade.

37. Rogers thanks the Department for the opportunity to share its views and participate in this consultation process.