



April 6, 2023

Ms. Josette Gallant
Senior Director, Terrestrial Engineering and Standards
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5
(Submitted by email)

Subject: SRPS-517, Draft Issue 2 and RSS-199, Draft Issue 4

Dear Josette Gallant,

In January 2023, the Department requested that RABC review draft Issue 4 of Radio Standards Specifications (RSS) -199 – *Broadband Radio Service (BRS) Equipment Operating in the Band 2500–2690 MHz*; and draft Issue 2 of Standard Radio System Plan (SRSP) – 517, *Technical Requirements for Broadband Radio Service in the Band 2500-2690 MHz*. The Board assigned the review of the standards to its Advance Wireless Services (AWS) subcommittee. At the request of the Department, RABC also posted RSS-199 on its website to facilitate comments from Canada’s World Trade Organization (WTO) partners.

The AWS subcommittee held one call to review the standard and provide initial feedback to the Department. After the call, upon considering the feedback from RABC, the Department circulated updated drafts on March 28, 2023. The subcommittee reviewed the updates and provided additional feedback to the Department by email which, in turn, generated some further updates from the Department.

RABC recommends publication of the drafts that were circulated by the Department on Monday April 3, 2023, along with the Department’s further change to RSS-199 paragraph 5.6 provided by email on April 5, 2023, plus the following recommended changes to SRSP-517:

- With respect to the e.i.r.p. limit, no reduction be made, but we leave it up to ISED to determine whether to continue to use 1640 Watts/MHz or move to using dbm/MHz. If the decision is to use dbm/MHz, then the limit should be at least 62.15 dbm/MHz (equivalent to 1640W/MHz). A limit of 63 dbm/MHz would also be acceptable if the Department would prefer to avoid using decimal places.
- With respect to power reduction at various antenna heights (HAAT), RABC recommends continuing to use the existing table rather than moving to the formula approach.

Finally, did not receive any comments via the WTO portal on its website.

The Board has now completed its review. We appreciate having had the opportunity to review the updated standards.

Sincerely,



J. David Farnes
General Manager