**The IEEE 802 Lan/Man Standards Committee Response to Innovation, Science and Economic Development Canada Consultation on the Technical and Policy Framework for Radio Local Area Network Devices Operating in the 5150-5250 MHz Frequency Band**

**Comments Of IEEE 802**

1. IEEE 802[[1]](#footnote-1) respectfully submits these responses to the Innovation, Science and Economic Development Canada (ISED) consultation[[2]](#footnote-2).
2. IEEE 802, as a leading consensus-based industry standards body, produces standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless personal area networks (“WPANs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANS”). Included in our standards development activity is an emphasis on coexistence, which is the focus of our Wireless Coexistence working group. We appreciate the opportunity to provide these comments to the ISED.

**Response**

1. First and foremost, we would like to commend ISED for considering modification to the current technical and policy framework for radio local area network (RLAN) devices operating in the 5150-5250 MHz frequency band. We share the opinion of ISED that harmonizing spectrum use with international allocations and standards is key to larger markets and lower manufacturing costs of equipment due to economies of scale. Towered that objective, IEEE 802’s view is that early harmonization of regulations with that of U.S. FCC and removing restrictions by allowing both the current indoor and a new outdoor use of higher power RLAN devices as expressed by the Canadian stakeholders is the best course of action.
2. In the following, please see comments and responses to the three points:
	1. The demand for and benefit, if any, of allowing HPODs in the 5150-5250 MHz frequency band before WRC-19

As ISED acknowledged there is considerable demand for Wi-Fi devices, IEEE 802 believes that there is sufficient benefit and demand to justify aligning to the current FCC rules in the 5150-5250 MHz band in Canada prior to WRC-19.

As it is elaborated in ISED consultation Paragraphs 20 and 21, the demand for unlicensed spectrum capacity is increasing very fast due to explosive increase in the number of devices and services. IEEE 802.11ac and 802.11ax are developed with the premise of enabling multi Gbps services through enablement of 80MHz and 160MHz channels. High Power Outdoor (HPOD) operation, aligned with FCC rules, in the 5150-5250 MHz makes the expansion of Wi-Fi capability possible via availability of two 80 MHz channels or one 160 MHz channel when the spectrum is combined with the adjacent 5250-5350 MHz band.

Note that a large number of unlicensed devices, including the IEEE 802.11ac [1]enabled devices, are already certified and available to support 5150-5250 MHz as well as 5725-5850 MHz bands. IEEE 802.11ax [2] enabled products are also expected to come to the market soon. Around 50,000 HPODs have been licenced by US FCC. Moreover, considering similar regulatory requirement in Canada as those in US, it is expected that the devices and access points can be quickly adapted for authorization and operation in the 5150-5250 MHz band in Canada well in advance of WRC-19.

* 1. The potential impacts on domestic and foreign satellite systems in the 5150-5250 MHz frequency band of authorizing HPODs use prior to WRC-19 on the basis of a maximum e.i.r.p. of 4 W. Requirements for an elevation mask towards satellites and an exclusion zone of 25 km around receiving earth stations to protect all satellite systems would likely also apply.

Given similar satellite uplink systems exist in the US, the FCC previously studied the possible impact as they developed the update to their rules, and after much thoughtful consideration and consultation with industry, issued the current rules through the aforementioned report and order. In this regard, we believe it is prudent to adopt the current FCC rules for the 5150-5250 MHz band, which should prove sufficient to protect both the US and Canada uplink satellite systems from harmful interference. It was also mentioned that the Globalstar receivers can monitor noise levels, providing the ability to inform the FCC and ISED of possible interference events.

However, Canada also has a downlink satellite system with an earth station in Ottawa that is entitled to protection. With this in mind, and given devices have been successfully operating in the band in the US since the report and order, we recommend ISED to issue rules aligned to the FCC for the band, and if needed, implement further restrictions, such as an exclusion zone to protect the earth station in Ottawa. In doing so, this exclusion zone and any future earth station exclusion zones should consider minimizing the covered population impact consistent with antennas operations and characteristic. As we understand, currently the operation of non HPOD Wi-Fi network allowed everywhere including any areas considered as the exclusion zone and will remain that way. For the single station and future, the restriction on HPOD should be minimized as much as possible to maximize the benefit of Wi-Fi operation for the Canadian people without compromising operation of the primary system.

* 1. Should the Department proceed to authorize HPODs use prior to WRC-19, what regulatory approach would best ensure a balance of timely deployment and the protection of other existing and future services in the 5150-5250 MHz frequency band? Also, indicate any and all considerations that should be given to equipment standards, technical requirements, eligibility criteria and/or conditions of licence depending on the relevant approach.

IEEE 802 recommends ISED to follow the regulatory approach from the US FCC, for example allowing both indoor and outdoor use at up to 4W EIRP, a limitation of 125 mW EIRP at elevation above 30 degrees, and notification of deployments consisting of over 1000 access points. In addition, due to downlink facility in Ottawa (and any future downlink facilities), limited exclusion zone can be considered based on detailed study of relevant antennas operations and characteristic to minimize the impact on Wi-Fi coverage.

**CONCLUSION**

1. IEEE 802 supports ISED’s efforts in modification to the current technical and policy framework for radio local area network (RLAN) devices operating in the 5150-5250 MHz frequency band to relax restriction on the band. As detailed out on the responses above, we believe that early harmonization of regulations with that of U.S. FCC and removing restrictions by allowing both the current indoor and a new outdoor use of higher power RLAN devices is the best course of action.

Respectfully submitted

**References:**

1. [IEEE 802.11ac Reference]
2. [IEEE 802.11ax Draft or PAR]
1. The IEEE Local and Metropolitan Area Networks Standards Committee (“IEEE 802” or the “LMSC”). [↑](#footnote-ref-1)
2. This document represents the views of IEEE 802. It does not necessarily represent the views of the IEEE as a whole or the IEEE Standards Association as a whole. [↑](#footnote-ref-2)