

September 6, 2024

Innovation, Science and Economic Development Canada

Engineering, Planning and Standards Branch
Attention: Regulatory Standards Directorate
235 Queen Street
Ottawa ON K1A 0H5
Canada

Dear Regulatory Standards Directorate,

The Dynamic Spectrum Alliance (DSA)¹ supports Innovation, Science and Economic Development Canada's (ISED) updating its Radio Standards Specification RSS-248, issue 3² to include license-exempt Very Low-Power (VLP) devices authorized to operate indoors and outdoors across the entire 5925-7125 MHz range.

VLP devices utilizing 160- and 320-MHz wide channels can support augmented / virtual / mixed reality (AR/VR/MR) applications in domains including education, healthcare, entertainment, and manufacturing. The inclusion of the VLP devices in RSS-248, issue 3, will bring economic and societal benefits to Canadians.

At the respective EIRP and Power Spectral Density (PSD) limits of 14 dBm and -5 dBm/MHz, the risk of harmful interference to incumbent operations in the band from VLP devices is extremely low. The DSA remains confident that even if ISED set the PSD limit at 1 dBm/MHz as authorized in the European Union, the increase in the risk of harmful interference would be negligible. The additional mitigations ISED put in place for VLP devices, including the prohibition of VLP devices

¹ The Dynamic Spectrum Alliance is a global, cross-industry alliance focused on increasing dynamic access to unused radio frequencies. The membership spans multinational companies, small- and medium-sized enterprises, academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the utilization of available spectrum to the benefit of consumers and businesses alike. A full list of the DSA members is available on the DSA's website at www.dynamicspectrumalliance.org/members/.

² "Radio Standards Specification RSS-248, issue 3, Radio Local Area Network (RLAN) Devices Operating in the 5925-7125 MHz Band", Innovation, Science and Economic Development Canada, released June 2024. [ISED Radio Standards Specification, RSS-248, issue 3, June 2024 - Radio Local Area Network \(RLAN\) Devices Operating in the 5925-7125 MHz Band - RABC-CCCR](#). ("RSS-248, issue 3")

from employing fixed outdoor infrastructure and requiring “transmitter power control”, should help allay any residual concerns.

The DSA notes that ISED’s revision of Section 4.8.5 ‘Combining equipment classes in a single RLAN device’ in RSS 248, issue 2 into new Section 4.8.8 in RSS 248, issue 3 significantly streamlines the text. In issue 2, equipment classes could be combined in a single RLAN device under the three different categories listed.³ In issue 3, the standard is, “When combining different equipment classes in a single RLAN device, the most stringent restrictions prescribed for respective equipment classes shall apply”⁴

Without issue 2 in hand, and with the authorization of VLP devices, the DSA is concerned that there is insufficient context provided for the single sentence in Section 4.8.8, issue 3, for manufacturers to be certain they have interpreted the section correctly. Is ISED’s intent that the combined device incorporates the most stringent operational requirements in Section 4.8? The DSA suggests that ISED consider revisiting the evolution of the text from Section 4.8.5 in issue 2 to Section 4.8.8 in issue 3 and provide some additional context.

Finally, the DSA continues to encourage ISED to consider permitting indoor client-to-client communications⁵, which would enable additional types of innovative license-exempt operations across the 6 GHz band. DSA believes that such client-to-client communication is viable and can be implemented in a manner that protects incumbent operations.

As always, the DSA stands ready to answer any questions you may have.

Respectfully submitted,



Martha SUAREZ
President
Dynamic Spectrum Alliance

³ See “Radio Standards Specification RSS-248, issue 2, Radio Local Area Network (RLAN) Devices Operating in the 5925-7125 MHz Band”, Innovation, Science and Economic Development Canada (RSS 248 issue 2) at 9. [RSS-248 – Radio Local Area Network \(RLAN\) Devices Operating in the 5925-7125 MHz Band \(canada.ca\)](#)

⁴ See RSS 248, issue 3 at 10.

⁵ See [DSA-Comments-to-ISED-on-the-6-GHz-Band.pdf \(dynamicspectrumalliance.org\)](#) at 5.