



By Electronic Delivery to Jean-Claude.Brien@ic.gc.ca

January 28, 2013

Attn: Jean-Claude Brien
Director, Regulatory Standards, Engineering, Planning and Standards Branch
Industry Canada
365 Laurier Avenue W., Room 200-A
Ottawa, Ontario K1A 0C8

Re: *RSS-213 - 2 GHz License-exempt Personal Communications Service Devices (PCS)*

The Telecommunications Industry Association's ("TIA")¹ hereby submits this communication to Industry Canada regarding recent changes made in the United States by the Federal Communications Commission ("FCC") to regulations governing Unlicensed Personal Communications Service ("UPCS") use in the 1920-1930 MHz frequency band.² We urge Industry Canada to harmonize relevant portions of RSS-213³ with new FCC UPCS rules to provide certainty to the manufacturers and suppliers of unlicensed cordless telephones and other information and communications technology ("ICT") equipment.

¹ TIA is a Washington, DC-based trade association and standard developer that represents the global information and communications technology ("ICT") industry through standards development, advocacy, trade shows, business opportunities, market intelligence and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA's hundreds of member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is an accredited standard development organization for the ICT sector by the American National Standards Institute ("ANSI").

² Amendment of Part 15 of the Commission's Rules Regarding Unlicensed Personal Communications Service Devices in the 1920-1930 MHz Band, ET Docket No. 10-97, *Report and Order* (rel. Mar. 23, 2012), available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2012/db0323/FCC-12-33A1.pdf ("UPCS Order").

³ See Industry Canada, Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands), RSP-102 Draft Issue 5 (Dec. 2012).

In March of 2012, the FCC modified its rules for UPCS devices in the 1920-1930 MHz frequency band “to promote more efficient use of the UPCS band and to facilitate the introduction of a new generation of unlicensed devices capable of supporting broadband connectivity using Digital Enhanced Cordless Telecommunications (“DECT”) technology.”⁴ The UPCS Order removed the least-interfered channel monitoring threshold for UPCS devices and, to enable the least-interfered channel access method, lessened the duplex system access channel count that must be delineated by a UPCS device from 40 to 20 channels. The UPCS Order also delegated the ability to the FCC’s Office of Engineering and Technology to approve for use new versions of the ANSI C63.17⁵ standard for methods of measurement of UPCS devices to the extent that the changes do not raise major compliance issues.⁶

TIA has long supported this change to the FCC’s rules,⁷ and our members were pleased to see the these changes to the FCC’s rules published in the Federal Register, making the effective date of such changes August 22, 2012.⁸ TIA, representing the ICT manufacturer and supplier community, believes that the changes effected in the UPCS Order will enable use by UPCS devices of more operational frequencies than were previously tolerated and, while responsibly controlling the prospect of harmful interference to other devices, allow for more inventive cordless broadband technologies in the UPCS band.

⁴ See UPCS Order at ¶ 1.

⁵ ANSI C63.17-2006: “Methods of Measurement of the Electromagnetic and Operational Compatibility of Unlicensed Personal Communications Services (UPCS) Devices,” 2006.

⁶ See UPCS Order at ¶ 13.

⁷ See, e.g., Comments of TIA, WT Docket No. 07-195, WT Docket No. 04-356, RM-11485 (filed Oct. 3, 2008), available at http://www.tiaonline.org/gov_affairs/fcc_filings/1003_DECT_Petition_Comments-Final.pdf.

⁸ See Unlicensed Personal Communications Service Devices in the 1920–1930 MHz Band, 77 Fed. Reg. 141, 43008-43014 (Jul. 23, 2012), available at <http://www.gpo.gov/fdsys/pkg/FR-2012-07-23/pdf/2012-17793.pdf>.

We therefore request that Industry Canada revise RSS-213 to harmonize it with the FCC's UPCS Order, and to give ANSI C63.17-2006 normative status in this context. To harmonize RSS-213 with the UPCS Order, most changes will have to be made to Section 4.3.4 (Verification of Access Protocols). For example, with the FCC's rule changes, systems that use a dual mode approach can monitor 60 or 30 (double slot) time frequency windows; however, this use would not meet the current requirements of Section 4.3.4's (Verification of Access Protocols) paragraph (b), where a minimum of 40 duplex system channels is required.

We urge you to contact the undersigned with any questions or concerns regarding our request, and look forward to working with Industry Canada moving forward to ensure that innovative products can be developed for and marketed to both American and Canadian consumers. Making the changes requested above would enhance regulatory certainty for companies that serve both markets, and would directly benefit North American consumers.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Brian Scarpelli

Brian Scarpelli
Senior Manager, Government Affairs

TELECOMMUNICATIONS INDUSTRY ASSOCIATION
1320 N. Courthouse Rd., Suite 200
Arlington, VA 22201
703.907.7700