

January 19, 2021

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Innovation, Science and Economic Development Canada
c/o Senior Director, Spectrum Licensing and Auction Operations
235 Queen Street, 6th Floor
Ottawa, Ontario
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Subject: ***Canada Gazette, Part I, Volume 154, Number 49; SMSE-014-20 –
Consultation on the Technical and Policy Framework for Licence-Exempt
Use in the 6 GHz Band***

1. Pursuant to the procedures established in *Consultation on the Technical and Policy Framework for Licence-Exempt Use in the 6 GHz Band*, (“the Consultation Document”) the Canadian Communication Systems Alliance, Inc. (“CCSA”) hereby submits its comments.
2. CCSA speaks for independent communications distributors – smaller broadcasting distribution companies, telephone companies and ISPs – across Canada. CCSA represents more than 100 companies operating from sea to sea to sea, including across the North.
3. CCSA has had the opportunity to review, in draft, the comments of CanWISP in response to this consultation. Many of CanWISP’s members are also members of CCSA.
4. CCSA fully supports and endorses CanWISP’s analysis and recommendations.
5. Affordable access to quality spectrum, generally, is a huge issue for the smaller, mostly rural communications companies that CCSA represents.
6. That is especially true as rural telecommunications service providers increasingly rely on fixed wireless technology as a cost-effective means of extending the reach of

their broadband networks to extend service to currently unserved and under-served areas and communities adjacent to their existing networks.

7. In addition to supporting CANWISP's comments and recommendations, CCSA offers the following comments.
8. In response to Question 7 in the Consultation Document, CCSA submits that, in order to realize the maximum capacity of high density and/or high performance indoor RLANs, access to as much spectrum as possible is of great advantage. CCSA supports the limits proposed in sections b, c, and d of question 7 to allow low power, indoor APs to be permitted to operate across the frequency range 5925-7125 MHz.
9. In response to Question 8 in the Consultation Document, CCSA supports the limits proposed in sections b, c, and d of question 8 to allow very low power APs to be permitted to operate across the frequency range 5925-7125 MHz.
10. CCSA thanks the department for the opportunity to make these comments.

Sincerely,



Christopher J. Edwards
Vice-President, Regulatory Affairs

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