



March 29, 2017

Innovation, Science and Economic Development Canada (ISED)

RE: Canada Gazette notice January 28th SMSE-002-17 - Consultation on the Technical and Policy Framework for Radio Local Area Network Devices Operating in the 5150-5250 MHz Frequency Band

The Canadian Urban Transit Association (CUTA) is a member-based association that seeks to inspire and influence the evolution of integrated urban mobility in Canada. We represent transit systems, government agencies, as well as transit manufacturers and suppliers.

Whereby the purpose of consultation SMSE-002-17 is to satisfy the objective of the *Spectrum Policy Framework for Canada* to maximize the potential economic and social benefits that Canadians derive from the use of the radio frequency spectrum, we would like to offer the comments:

Transit agencies have a strong need for wireless data communications options with fleet vehicles and for field operations staff – area-wide, along corridors, and in the vicinity of their facilities.

Over the past decade or so, these needs have usually been addressed through a combination of commercial cellular data and local agency-operated WiFi. Some agencies have also set up WiFi access points on vehicles, as a customer amenity and for vicinity wireless communications with onboard equipment.

A key current challenge for transit agencies is that wireless data communications (for outside of the range of WiFi access points set up from their assets) is largely limited to the pool of commercial cellular data network providers. The very small number of competitors has tended to reduce price competition and limit innovation in the services offered.

The potential regulatory changes under consideration to allow for the outdoor use of higher power WiFi devices seems to be favourable to transit agencies. The higher range should create new opportunities for transit agencies to collaborate with municipalities to create alternative communications infrastructure/options along transit routes and for the supporting the array of equipment at stations/terminals/garages.

We further recognize that the US has already made these same changes to the 5GHz spectrum. Should Canada adopt similarly, this would further create opportunities for efficiencies in the supply and use of related north American produced equipment.

To the extent the proposed changes stand to improve high speed internet connectivity for urban transit riders in Canada, or introduce easier installation and maintenance of high speed WiFi on rolling stock, and without increasing cost or anticompetitive restrictions, CUTA is in favour.

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VP Member Value