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Innovation, Science and Economic Development Canada
Senior Director, Terrestrial Engineering and Standards
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235 Queen Street (6 Floor, East Tower)
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(By email - consultationradiostandards-consultationnormesradio@ised-isde.gc.ca)

Re: SMSE-010-25 - Consultation on the Policy, Technical and Licensing
Framework for the VHF Maritime Frequency Bands

Dear Senior Director:

Please find attached the Canadian Wireless Alliance's (CWA) Reply Comments to the above referenced consultation, specifically in response to Questions Q4, Q5 and Q6.

We appreciate the opportunity to participate in this critical consultation.

Sincerely,

Mark E. Crosby
President

MEC:
Attachment

Attachment
Reply Comments in Response to SMSE-010-25
Canadian Wireless Alliance (CWA)

ISED Q4- ISED is seeking comments on the proposal to not accept licensing applications for new non-Maritime systems in the VDE bands.

Industry Responses/CWA Replies

Canadian Wireless Alliance (CWA) - Applications from new non-maritime systems in the VDE bands should be permitted if the proposed system operates with a digitally modulated emission and with the understanding that new non-maritime systems operate on a non-interfering basis to VDE operations. This policy will promote spectrum efficiency.

Radio Advisory Board of Canada (RABC) - Suggested that to support spectrum efficiency and flexibility within Canada, application for non-maritime use should be considered on a case-by-case based on their proximity to maritime and licensed public-safety licensees. RABC further recommended that new applications for nonmaritime systems shall operate with the understanding that these new systems shall operate on a non-interfering basis to VDE maritime systems.

CWA's Response - These RABC recommendations mirror in many respects CWA's initial suggestions that would serve to maintain maritime VDE spectrum priorities, but at the same time promote spectrum efficiencies by permitting non-maritime users to share available channels on a non-interfering basis.

Canadian Coast Guard (CCG) - Supports the proposal to not accept licensing applications for new non-maritime systems in the VDE bands.

CWA's Response - While we understand that it may be easier to protect CCG future VDE operations from the potential for interference from non-maritime users by instituting a blanket prohibition on any additional non-maritime applications, such a policy does not recognize that there are geographic areas within Canada where there are no maritime systems, nor are there prospects for any such systems. Implementing such a strict prohibition on all new non-maritime systems on VDE channels would not promote spectrum efficiency.

Further, Canadian Coast Guard operations obviously will continue to receive priority use status where their operations are paramount. Finally, we believe that non-maritime users would have little interest to deploy systems that would jeopardize the Canadian Coast Guard's critical mission.

Transport Canada - Agrees with the proposal to not accept licensing applications for new non-maritime systems in the VDE bands.

CWA's Response - For the reasons provided in our response to the CCG, there is an opportunity for non-maritime use in the VDE bands with the understanding that any new industrial, enterprise and public safety systems shall operate on a non-interfering basis to VDE maritime systems.

ISED Q5 - ISED is seeking comments on allowing existing non-maritime licensees to continue to operate on a NINP basis vis -a -vis maritime VDE terrestrial systems.

Industry Responses/CWA Replies

Canadian Wireless Alliance – Industrial, enterprise and public safety entities should be permitted to continue to operate non-maritime systems on a non-interference basis to VDE operations.

Radio Advisory Board of Canada - For the reasons identified in their response to Q4, the RABC recommends that non-maritime incumbent licensees, both industrial, enterprise and public safety entities, should be permitted to continue to operate on a non-interfering basis to VDE maritime systems. This approach supports efficient use of the VDE spectrum and ensures that the spectrum will remain available throughout Canada for use by current non-maritime licensees with the understanding that VDE operations are to be protected.

CWA's Response – We concur with the RABC's response to this question.

Canadian Coast Guard – CCG is concerned that allowing existing non-maritime licensees to continue to operate on a non-interference, non-protection (NINP) basis vis-à-vis maritime VDE systems would cause decreased range and reliability for mariners and VDE terrestrial systems.

CWA's Response - CWA is convinced that a mutually beneficial accommodation may be reached to assuage CCG's concerns of interference to their operations. We agree with Transport Canada that, in response to Q5, "Carrying such tolerance should be carefully reviewed, and risk mitigation be considered with all stakeholders affected."

Transport Canada - Transport Canada noted that "they do not believe interferences are currently existing" but that they cannot ensure that this will not change with upcoming

development from other modes. Carrying such tolerances should be carefully reviewed, and risk mitigation be considered with all stakeholders affected.

CWA's Response - We concur with Transport Canada's statement, and recommend that existing incumbents including industrial, enterprise and public safety licensees should be recognized as critical stakeholders.

ISED Q6 - ISED is seeking comments on protecting existing non-maritime public safety systems until January 1, 2035. After this date, these systems will operate on a NINP basis.

Industry Responses/CWA Replies

Canadian Wireless Alliance - Existing non-maritime public safety systems should not be on a 10-year clock to have their status changed to NINP but should remain in protected status until real-world operations demonstrate incompatibility.

Radio Advisory Board of Canada - Existing non-maritime public safety systems should not be on a 10-year clock to have their status changed to NINP but should instead remain in protected status until real-world operations evidence incompatibility.

CWA's Response - We concur with the RABC's response to this question.

Canadian Coast Guard - In response to Q6, the CCG repeated their concerns that permitting non-maritime public safety systems to continue to operate until 2035 could cause decreased range and reliability for mariners and VDE terrestrial systems.

CWA's Response - As Transport Canada noted in response to Q5, "there are no interferences that currently exist". As such, there appears to be no justification to have public safety non-maritime entities terminate their operations prior to January 1, 2035, unless there are instances of harmful interference to CCG operations. Further, non-maritime public safety systems should remain in protected status until real-world operations demonstrate incompatibility.

Transport Canada - There are no interferences that currently exists but cannot ensure that this will not change with upcoming development for other modes. Tolerances should be carefully reviewed, and risk mitigation should be considered with all stakeholders affected.

CWA's Response - We concur with Transport Canada's statements and recommendations.