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Innovation, Science and Economic Development Canada
Senior Director, Terrestrial Engineering and Standards
Engineering, Planning and Standards Branch
235 Queen Street (6th 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) responses to the above referenced consultation, specifically Questions Q4, Q5 and Q6.

We appreciate the opportunity to participate in this critical consultation.

Sincerely,

Mark E. Crosby
President

MEC:
Attachment

Attachment - CWA Response to SMSE-010-25

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

CWA Response – CWA recommends that applications for new non-Maritime systems in the VDE bands shall be permitted if the proposed system operates with a digitally modulated emission and with the understanding that new non-Maritime system will operate on a non-interfering basis to VDE maritime systems. CWA's response supports spectrum efficiency by permitting both public safety and industrial/enterprise entities continued access to VDE channels on a non-interference basis to VDE operations. The spectrum would be available for use throughout Canada both on navigable waterways for VDE systems and in geographic areas where there is limited risk of interference to VDE systems.

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

CWA Response - For the same reasons contained in our response to Q4, CWA 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 will support efficient use of the VDE spectrum as it will continue to be available throughout Canada for use by current non-maritime licensees with the understanding that VDE operations are to be protected from harmful interference. Further, VHF spectrum characteristics benefit users whose operations are located in the more rugged geographic areas of Canada.

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.

CWA Response - Existing non-maritime public safety systems should not be on a 10-year clock to have their status changed to non-interference/not protected (NI/NP) but should instead remain in protected status until real-world operations demonstrate incompatibility. Downgrading the status of existing LMR licenses, particularly the “larger provincial systems” identified by ISED, creates an unnecessary risk to operational performance and effective public safety response based on a 10-year forecast of VDES deployment of VDES that may turn out to be premature. ISED's analysis indicates that the majority of existing LMR licensees – public safety related as well as industrial and enterprise entities - operating in proximity to maritime services in the VDE bands can generally continue to operate. Such an operational environment supports continuing the status of existing systems as primary with interference situations resolved on a case-by-case basis as opposed to a blanket reduction in priority. The threat of a change of status will result in licenses, including provincial public safety systems, to consider the expenditure of funds to relocate the spectrum that may not be as suitable as the VHF bands and based on ISED's analysis, may be unnecessary.