

17 November 2022

Martin Proulx
Director General Engineering Planning and Standards Branch
Spectrum Management and Telecommunications
Innovation, Science, and Economic Development Canada
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via electronic mail: spectrumengineering-genieduspectre@ised-isde.gc.ca

Subject: *SMSE-011-22: Notice of Application Received from Ligado Networks (Canada) Inc. for Ancillary Terrestrial Component Authority in the L-Band (1526-1536 MHz, 1627.5-1637.5 MHz, and 1646.5-1656.5 MHz), dated August 19, 2022*

Dear Mr. Proulx:

The Canadian Business Aviation Association (CBAA) and the National Business Aviation Association (NBAA) represent the safety interest of business aviation owners and operators in Canada and the US appreciate the opportunity to comment on the Ligado Networks Canada (“Ligado Canada”) application SMSE-011-22 dated August 19, 2020, Notice of Application Received from Ligado Networks (Canada) Inc. for Ancillary Terrestrial Component (“ATC”) Authority in the L-Band (1526-1536 MHz, 1627.5-1637.5 MHz, and 1646.5-1656.5 MHz).

In their application, Ligado Canada proposes to operate an ATC in a manner similarly to how they have been authorized by the US Federal Communications Commission (“FCC”) to operate in the US, however, Ligado Canada’s application is for significantly higher power levels (~82 times greater) and relaxed Out-Of-Band-Emissions limits.

In view of the concerns previously submitted in the US (refer to appendix 1), and by comments submitted to ISED in response to the subject Notice by Canadian aviation stakeholders, including the 15 November 2022 joint letter by the National Airlines Council of Canada (NACC), Air Transport Association of Canada (ATAC) and the International Air Transport Association (IATA), a letter by the Air Line Pilots Association (ALPA), and others, we are hereby joining with these stakeholders in providing our support to the comments being submitted for Innovation, Science, and Economic Development’s (“ISED’s”) consideration. It is further our understanding that Transport Canada has also provided its own comments to ISED in this matter.

On these grounds, we recommend that ISED reject the Ligado Canada Application at any power level until such a time as aviation safety concerns are resolved.

Regards,



/s/

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Appendix 1

US industry comments to the US Ligado filing: <https://nbaa.org/wp-content/uploads/aircraft-operations/cns/gps/20200522-FCC-Filing-LightSquared.pdf>

Industry response to Ligado's comments: <https://nbaa.org/wp-content/uploads/aircraft-operations/cns/gps/20200608-Joint-Aviation-Reply-to-Ligado-Oppositions.pdf>