Reporting and Compliance

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Images from Wikimedia Commons

Tacit Law

Agenda

- ISED Reporting Requirements
 - Tower Collocation
 - Spectrum Deployment Technical Data
 - Spectrum Deployment Report
 - Licence Compliance Report
 - Safety Code 6 Reporting
 - Broadband Maps
 - New Tower Builds
- CRTC Reporting Requirements
 - Registration as carrier
 - Data Collection System
- Other Entities
 - Canadian Centre for Cyber-Security
 - Canada Labour Program

ISED Reporting Tower Collocation

- Generally triggered by ownership of spectrum licence or frequency licence
- Twice a year, March 1 and Sept 1
- Form is emailed to you, and filed by email, RTS-IPP@ic.gc.ca
- Only applies to collo requests to/from licensees identified as carriers in ISED's billing database. This list is sent with the email.
- No reporting required for collo requests to/from non-carriers, ex. vhf/uhf operators, tower real-estate companies.

If you initiate/receive a tower sharing request to/from <u>another carrier</u>:

- You must receive or provide a unique request ID. Both carriers use this same ID in report.
- The information that must be provided and the timelines that must be observed are provided at the ISED website:
 - Framework for Mandatory Roaming and Antenna Tower and Site Sharing
- Exclusive arrangements are prohibited.
- The report is not publicly accessible.



Tower Sharing Report Form

• First tab contains contact information

	В	С								
1										
2 1	1. Contact Information									
3										
4 P:	ovide the name, title, telephone number, and email for a primary contact and alternate to answer ques	tions regarding the data provided.								
5										
		All rows are mandatory.								
		You must provide a primary and alternate contact.								
6		Enter your data in column C								
7 1	Name of Licensee (as it appears on your licence) max 100 char.	YourCompany								
8 2	Primary Contact Name max 60 char.	Your Name								
9 3	Primary Contact Title max 80 char.	Title								
10 4	Primary Contact Telephone Number format to use 613-555-1234 (no extensions)	888-867-5309 x101								
11 5	Primary Contact Email Address max 129 char.	regulatory@yourcompany.ca								
12 6	Alternate Contact Name max 60 char.	Somebody Else								
13 7	Alternate Contact Title max 80 char.	Title								
14 8	Alternate Contact Telephone Number format to use 613-555-1234 (no extensions)	888-867-5309 x102								
15 9	Alternate Contact Email Address max 129 char.	another@yourcompany.ca								
16 17	Note that the licenses name entered is call 07 will externatively be added to the ten of Taba 0, 0,									
17 18	Note that the licensee name entered in cell C7 will automatically be added to the top of Tabs 2, 3 and 4									



Tower Sharing Report Form

	А	В	С	D	E	F	G	Н		J	K	L
1	2. Tower	r Sharing Requ	uests Initia	ted								
2												
3	Licensee]	Name	YourCompany				Period covere	d by this rep	ort:	March 1, 2019 t	to August 31, 202	21
	Must include all new requests initiated during the reporting period and data regarding ongoing negotiations (with no date in column K or L in your previous report); do not include 1 for 1 equipment swaps. We should be able to match all records in this worksheet with those in the tower owner's Requests Received spreadsheet											
5	All dates mu First six columns are mandatory If E							e within the report e included in colum	n-dd format and follov ing period <i>unless upd</i> in K or L, other negot two dates (sent and r	<i>lating request from</i> tiation dates must a	<i>the previous report</i> lso be included in tl	that was ongoing nat row
6	MUST BE UNIQUE			Physical	Location of	tower	Stage 1		Stage 2		Stage 3	If no agreement
7	Unique request identifier	Name of tower owner (only include carriers, refer to our list)	Unique <u>site</u> ID	Civic Address	Latitude in decimal format (ex. 43.1851)	Longitude in decimal format (ex. -79.9447)	Date PIP request sent to tower owner	Date PIP request responded to by tower owner	Date Proposal to Share sent to tower owner	Date Proposal to Share responded to by tower owner (considered Offer)	Date a Tower Sharing Agreement was entered into	Date request was cancelled or tower owner considered it withdrawn
8												
9 10					N	o requests initia	ted or received during	he reporting period.				
	This has to match for both carriers. Most of t have not				ime, you a to report	Infc	contents ormation Pa ined in the	ackage ar	e			

Tower Sharing Report Form

• You provide information on the number of towers you own and operate from in the fourth tab.

	A	В	С	D	E	F	G					
1	1 4. Towers and Sites in Network											
2	Licensee Name YourCon		mpany	Period covered by this report:	March 1, 2019 to August 31,							
4 5		Columns A to F are	e mandatory. Ever		ude a <u>number</u> (no text).						
6												
	Total number of towers and sites in network <u>must be equal to columns</u> <u>B+D+E+F</u>	Total number of towers your company owns	Total number of towers owned (from B) that are shared with at least one other <i>carrier</i> (do NOT include number from column C in total in column A)	Total number of towers owned by another <i>carrier</i> on which you have equipment and operating from	Total number of towers owned by 3rd party (e.g. tower company or other type of licensee) on which you have equipment and operating from	Total number of sites (rooftops, church steeples, water towers, etc) on which you have equipment and operating from						
7 8	100	30	0	1	9	60	Enter your					
9	•		-		1	1						
10	*NEW* Before submi	itting your data, please co	ompare it to your previo	ous report.								
12	While we expect towe	rs to be decomissioned fr	om time to time, genera	ally the numbers provided s	hould NOT be decreasing fr							
13 14		s decrease or there is a sig	gnificant fluctuation fro	om one reporting period to a	another, please provide a det	tailed explanation <i>in your</i>	email.					
17							D-					
	🔪 Th	nis has to	equal the				i i l Tac					

number sum of these four numbers



ISED Reporting Tower Collocation

• If you do initiate or receive a request with another carrier, review the ISED Framework and keep all documentation.

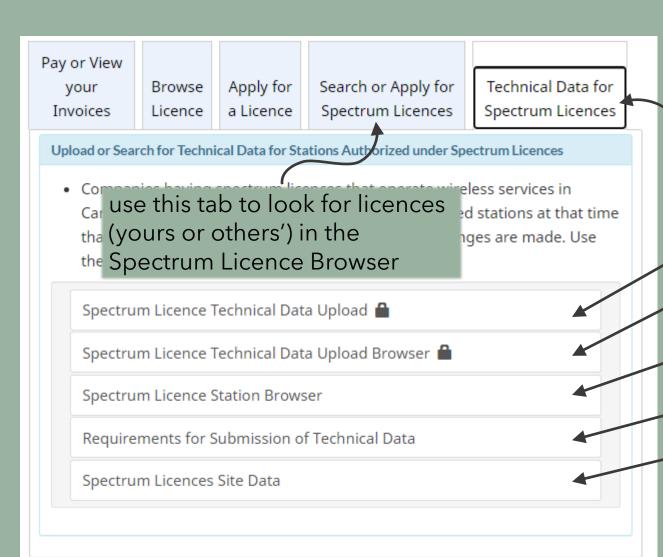




ISED Reporting Spectrum Deployment Data Upload

- Triggered by ownership of spectrum licence (ex. 3.65 GHz or 5.2 GHz).
- Does not apply to station licences (ex. Microwave point-to-point, vhf/uhf stations).
- Supposed to be updated with every change in deployment
- Your spectrum licence number looks like 010234567-002
- Last three digits (ex. -002) are supposed to be incremented (ex. to -003) with each licence renewal. Licence term may be one year, five years, or any other time period.
- When the last three digits are incremented, your previous upload disappears.
- This is supposed to happen on the licence roll-over date, but in reality it happens when it happens. It's good practice to check every six months in the Spectrum Licence Browser.
- The report is publicly accessible.



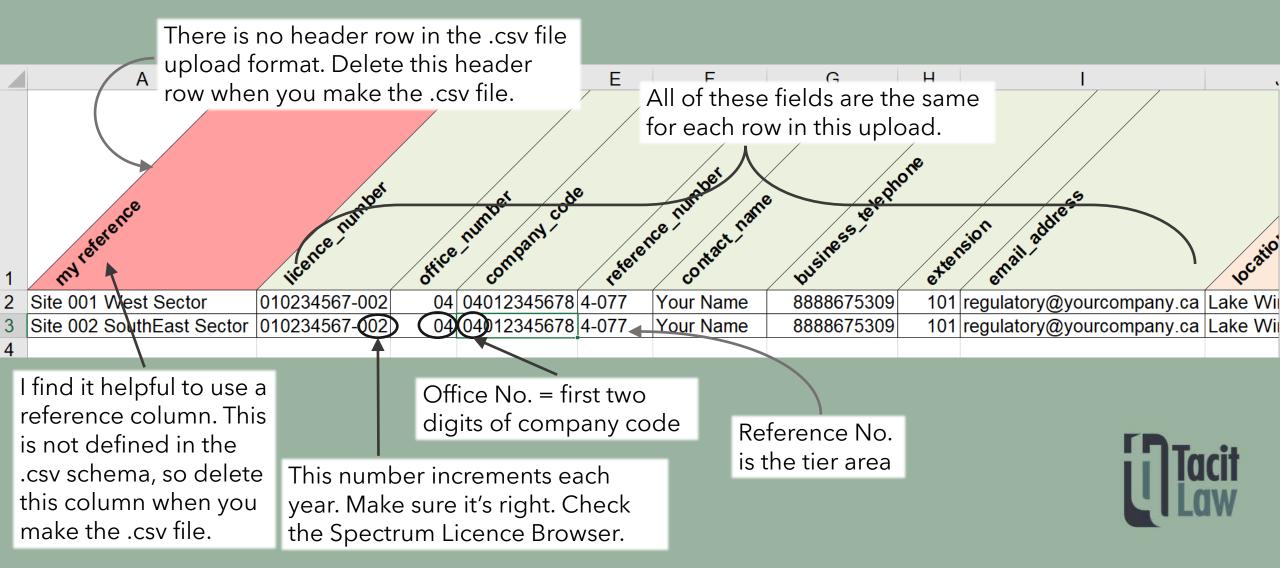


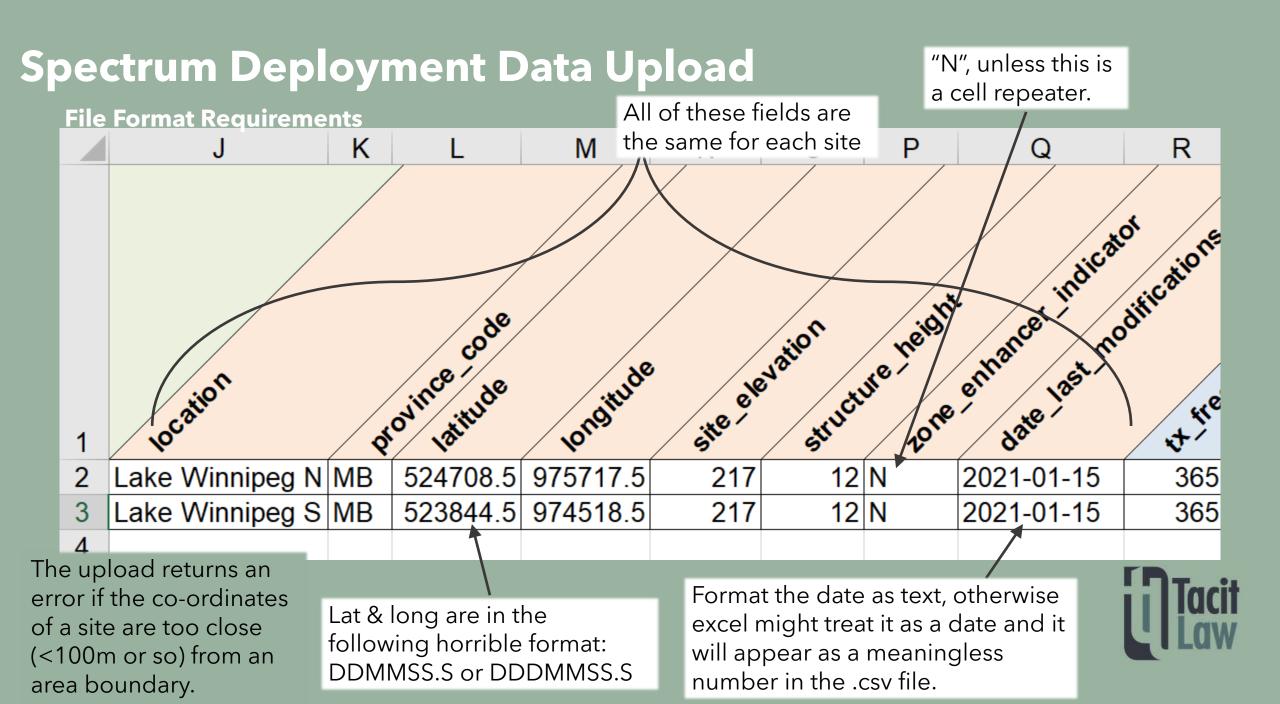
- Reporting is accessed through the <u>Spectrum</u> <u>Management System</u> website, under "Radiocommunication Licensing Services"
- If you don't have a login, you will register for one.
- this tab for upload and file description
- this link for upload
- this link to check that you're up to date
- this link to search for uploaded data by geographic area
- this link for file format requirements
- this link to download all uploaded data

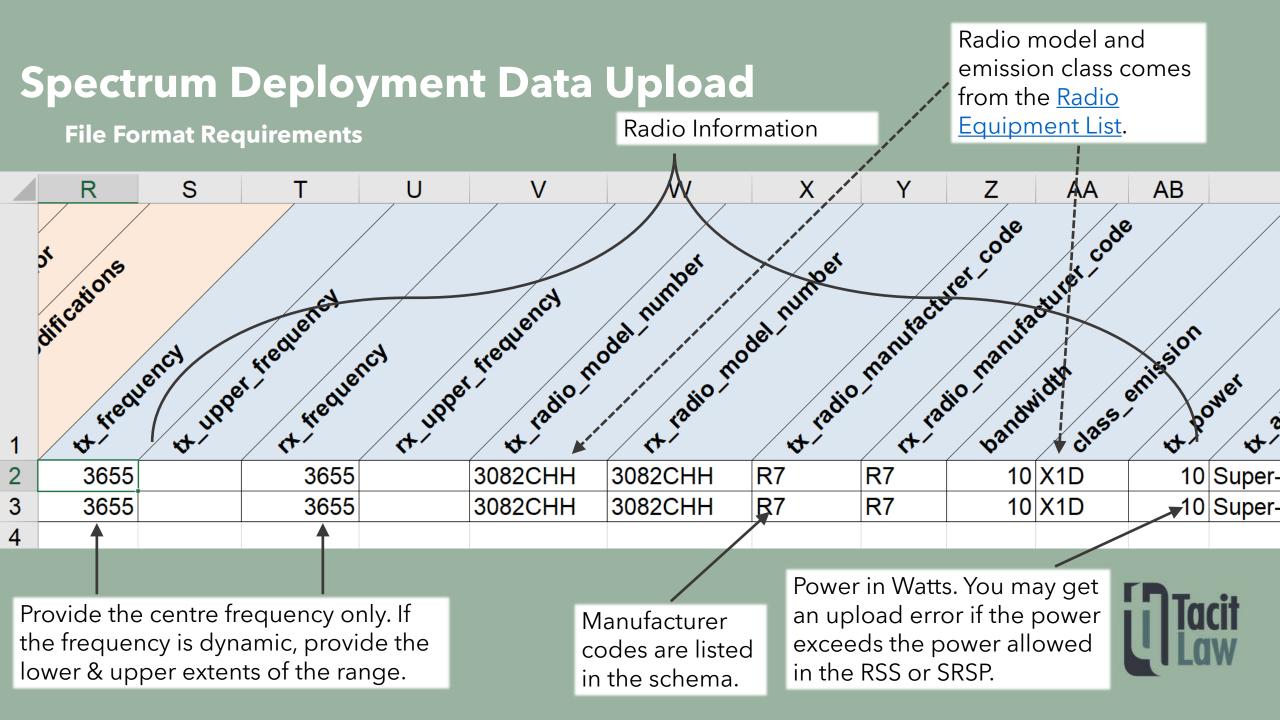
- If you don't have a login, you will register for one.
- If you have trouble with registration or upload, your local spectrum management office should be able to assist. Find a contact email in <u>RIC-66</u>.
- Upload must be done using a .csv file. It is helpful to prepare this using an excel file.
- The schema and field descriptions for the .csv format can be found <u>here</u>, or by following the link on the previous slide.
- Upload one .csv file for each licence area.
- There is one line per antenna/sector and one line per frequency.
- Once you have completed the upload, click "Refresh". You will see either an error message (unhelpful) or a message of "Success!" You are not done. Be sure to scroll to the bottom of the page and click "Import".



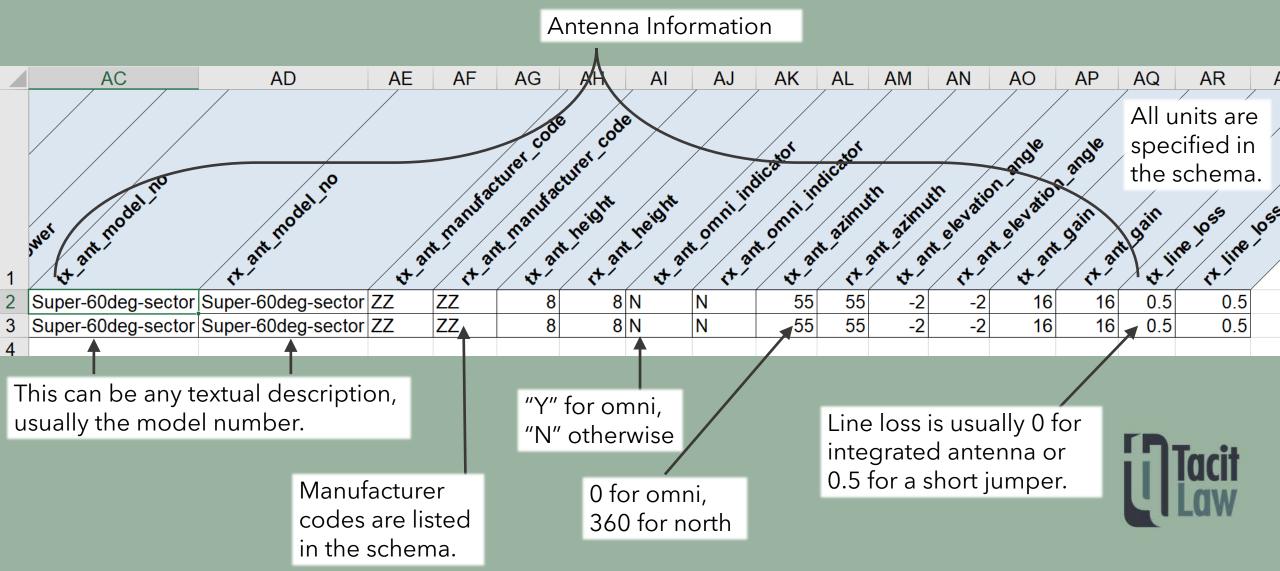
File Format Requirements







File Format Requirements



Radio Information

Radio Equipment Search

The radio model and emission class can be found in the <u>Radio Equipment List</u> which contains data for all approved radios.

Hardware Version Identification ±. Number (HVIN): Radio Equipment List (REL) - Search Results Product Marketing Name (PMN): Product Name PMP450 3 Items found Displayed Items: from 1 to 3 Host Marketing Name (HMN): Maximum Items on Page 20 v Sorting by Certification Number Update \sim Grouping by Company Certification Number **CSV** Download Company Name: Click on an HVIN links to view the Equipment Details Company Number: 109W - Cambium Networks Inc. Equipment Description: Hardware Version Identification **Firmware Version Identification** Product Marketing Host Marketing Certification Approva Number (HVIN) Name (PMN) Name (HMN) Number (FVIN) Date Number Advanced Search 3082CHH PMP450i 3GHz 109W-0028 2016-12-Radio Specification (BET \$99-RSS192 Tranceiver 29 R\$\$999) 3082HH PMP450i 3GHz 109W-0028 2016-12-Low Frequency (0-99999) [MHz] Tranceiver 29 PMP450i 3GHz 109W-0028 2016-12-3092HH High Frequency (0-99999) [MHz] Tranceiver 29 Occupied Bandwidth (0-99999) [kHz] Emission Code (Alphanumeric): Narrow your search by Choose the most likely Low Power (0-99999) [W] choosing the radio product. There are High Power (0-99999) [W] specification. RSS192 is often many that are the Effective Date (Both fields should be filled) for equipment in the From same. yyyy-mm-dd 3450-3650 MHz range. То yyyy-mm-dd

Radio Information

Radio Equipme	nt List (REL) - Details for: 30	B2CHH
Product Modifications (C2PC, C	BPC, C4PC) Multiple Listing Add New Product(s) (C1PC)	Partial Trans
Company Number:	109W	
Company Name:	Cambium Networks Inc.	
Certification Number:	109W-0028	
Approval Date:	Thu Dec 29 00:00:00 EST 2016	
Hardware Version Identification Number (HVIN):	3082CHH	
Product Marketing Name (PMN):	PMP450i 3GHz Tranceiver	
Host Marketing Name (HMN):		
Firmware Version Identification Number (FVIN):	-	
Equipment Description:	PMP450i Fixed Outdoor MIMO Transceiver	
Type of Radio Equipment:	Fixed Wireless Access Equipment (3450-3650 MHz)	
	Wireless Broadband Access (3650-3700 MHz), Unrestricted Contention Protocols	

Lab Information

Certified By:	Elite Electronic Engineering Co.	2987A
Wireless Lab:	D.L.S. Electronic Systems, Inc.	2060A
SAR Lab:		
RF Exposure Lab:		2060A-1
Nerve Stimulation Lab:		
Power Density Lab:		
Hearing Aid Compatibility Lab:		

RF Exposure Results

Radio Model Number for Columns V&W above

RF Exposure Results

Туре	Value	Compliance Distance			
RF	7.13 W/m2	840 mm			

Emission(s) Click on a Specification link to view the Emission Details

		Frequency Range				Power		
Specification	Issue Number	From	То	Emission Designator	Min.	Max.	Field Strength	Dist.
<u>RSS197</u>	1	3652.5 MHz	3697.5 MHz	4M67X1D	1.0 mW	3900.0 mW		
<u>RSS197</u>	1	3670.0 MHz	3680.0 MHz	36M5.1D	1.0 mW	12900.0 mW		
<u>RSS197</u>	1	3660.0 MHz	3690.0 MHz	18M3X1D	1.0 mW	15400.0 mW		
RSS192	3	3460.0 MHz	3640.0 MHz	18M3X1D	1.0 mW	33300.0 mW		
RSS192	3	3452.5 MHz	3647.5 MHz	4M57X1D	1.0 mW	36100.0 mW		
RSS192	3	3470.0 MHz	3630.0 MHz	36M6X1D	1.0 mW	40000.0 mW		

The last three characters are the emission designator in Column AA above. Here, the designator is "X1D".



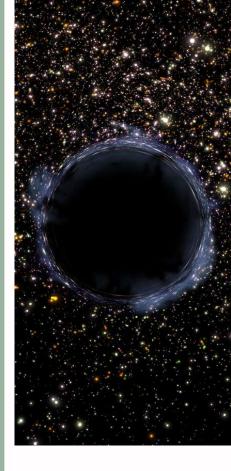
ISED Reporting Spectrum Deployment Data Upload

- You can get help from your friendly local spectrum officer (<u>RIC-66</u>).
- Or, from your friends at Tacit Law.



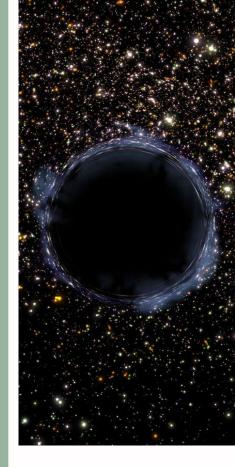
ISED Reporting Spectrum Deployment / Usage Report

- Triggered by ownership of a spectrum licence that comes with deployment requirements (i.e. spectrum bought at auction)
- Required, but there may be no notification.
- Report is sent to <u>ic.spectrumoperations-operationsduspectre.ic@canada.ca</u>.
- No template or required format.
- This is an attestation that you have met the deployment requirements associated with the licence.
- Not publicly accessible



ISED Reporting Spectrum Licence Annual Report

- Triggered by ownership of a spectrum licence that has a research & development requirement as a condition of licence (i.e. licence bought at auction).
- You should receive a request and template by email.
- Report is sent to <u>ic.spectrumoperations-operationsduspectre.ic@canada.ca</u>.
- Simple Word document the only required information is your revenues for the last fiscal year.
- If your revenues are less than \$1 billion, you are exempt from the R&D requirement.
- Not publicly accessible.





- Generally triggered by ownership of a spectrum licence.
- You should get a request for this report from ISED.
- Report is sent to ic.spectrumoperations-operationsduspectreic@canada.ca
- The report is submitted using an excel template showing the radiation levels at the selected reporting sites.

Resources

- <u>Limits of Human Exposure</u> (Safety Code
 6) from Health Canada
- <u>Technical Guidelines</u> from Health Canada
- <u>Technical Note 261</u> from ISED





Reporting Requirements

- You must report on 10% of your sites each year, and each year you should report on different sites.
- The sites in the report are distributed evenly across three categories:
 - Rooftop
 - Towers < 10m
 - Towers 10m to 15m
 - Towers 15m to 25m
 - Towers > 25m
- The results may be based on calculations or measurements. If the calculations show that public spaces are exposed to less than 50% of the SC6 limit, then measurements are not necessary.
- For many simple WISP sites, measurements are not necessary.





Three ways to demonstrate compliance

- Public space falls outside of exclusion zone based on calculation
- Public space is exposed to < 50% of SC6 limit based on calculation
- Public space is exposed to < 100% of SC6 limit based on measurements

Public Space

- "Public space" is accessible to the general public, with no access control or demarcation measures.
- "Public space" is up to 2m above ground level / rooftop level.
- If the bottom corner of your lowest antenna is 2.5m (8') above ground level, or above rooftop level, your site may be exempt.



Exclusion Zone Calculation

- You can do this yourself with time and technical expertise.
- Technical Note 261 (TN-261) from ISED
- TN-261 explains how to calculate the sphere and the cylinder
- If neither the sphere nor the cylinder, extend below the plane that is 2m above ground / rooftop, your site is exempt. No measurements are necessary.
- Exclusion zone is based on 50% of SC6 limit, using worstcase assumptions.

Figure 5 — If the near-field/far-field boundary (sphere) and the restricted zone (cylinder) intersect, the overall non-exemption zone is the combination of the sphere and cylinder

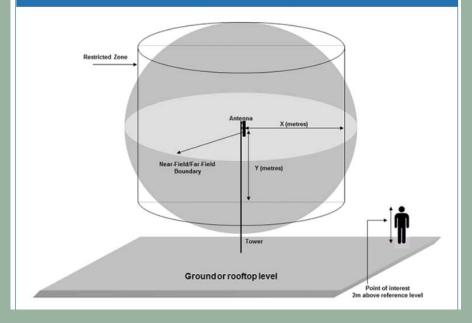


Image from TN-261



Radiation Level Calculation

- These calculations are normally conducted by an engineer, but that is not a requirement of ISED.
- Calculations must take into account all antenna systems on a site. This includes VHF/UHF systems, broadcast systems, cellular systems, and any other radiocommunication systems.
- If there are many operators on a site, it may not be practical to gather all antenna information, due to inaccuracies in the SMS database and difficulty getting information from other operators. In this case, calculations will not be possible.
- Some guidance on conducting these calculations is provided in the <u>Technical Guidelines</u> from Health Canada
- Further guidance can be found from <u>FCC OET Bulletin No. 65</u>.
- If the calculated exposure level is < 50%, then measurements are not necessary at that site.

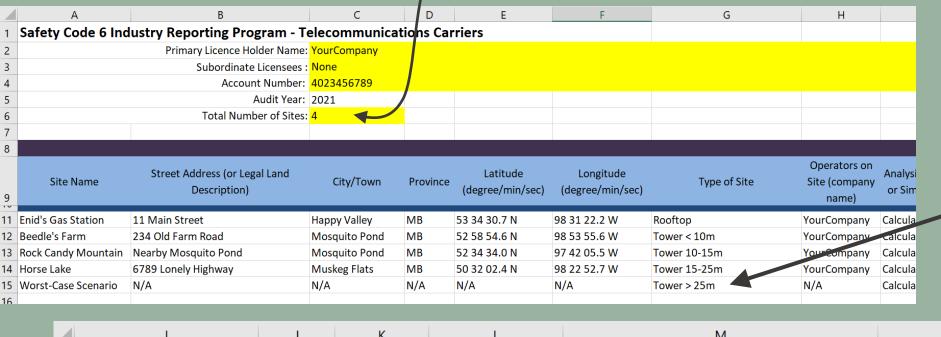


Measurements

- Measurements are normally conducted by an engineer, but that is not a requirement of ISED.
- Measurements require specialized equipment that can measure across all bands.



YourCompany has 31-40 sites total



ISED may request a single worstcase analysis of a large tower site.

	I	J	К	L	Μ	Ν
7						
8						
9	Analysis Type (Measurements or Simulations/Calculations)	Date of Analysis	Company Conducting Analysis	% of SC6 Limits for Uncontrolled Environments	Description of Access Control Mechanisms	Comments
11	Calculations	2021-09-15	ConsultCo	2.20%	Privately owned rooftop	
12	Calculations	2021-09-15	ConsultCo	<1%	Private property	
13	Calculations	2021-09-15	ConsultCo	<1%	Remote mountaintop site, anti-climb shield	
14	Calculations	2021-09-15	ConsultCo	<1%	Private property, fenced compound	
15	Calculations	2021-09-15	ConsultCo	<1%	N/A	



Controlled vs Uncontrolled Environments

- Note, the public exposure is calculated based on the SC6 limit for uncontrolled environments. There is a different (higher) limit for controlled environments.
- Safety Code 6 guidelines were developed with large cellular and broadcast operators in mind. The requirements are not always clear for WISP sites.
- In controlled environments, workers who have access to SC6 training can take measures to mitigate their exposure.
- Measures might include
 - Limiting the time of exposure
 - Wearing protective gear
 - Using an RF monitor





Safety Considerations

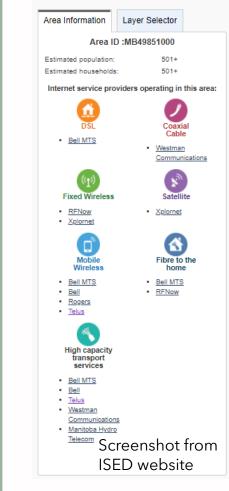
- For your operational use, you may want to get a personal RF monitor that workers can use while they climb towers. They can be had for ~\$1,500. They may not measure across all bands.
- Radio and TV broadcasting sites, and heavily congested cell sites, are of concern.
- Workers should not position themselves in front of antennas. It may be possible to reduce the power levels of other systems on the tower during work.





ISED Reporting Broadband Maps

- This is not a required report
- Broadband mapping data is displayed publicly at the <u>National Broadband</u> <u>Service Availability Map</u>
- This data is used to determine areas that are eligible for funding by ISED, as well as other funding bodies. If your 50 Mbps coverage is not shown, another company may receive funding to overbuild your network.
- You can update your coverage through ISED's <u>broadband network feedback</u> website.
- The feedback consists of a form (ISED-ISDE3708E, link on feedback website), along with coverage files (may be .kmz or another format) attached to the form.
- Form is submitted to ic.broadband-largebande.ic@canada.ca





ISED Reporting New Tower Construction Requirements

- If you are building a new tower or antenna supporting structure, you must comply with ISED's requirements in <u>CPC-2-0-03</u>
- If the land use authority (municipality, county, First Nation, etc.) has a consultation process, you must follow that process. For example, an industrial area may have specific zoning laws that permit communications towers with no consultation.
- If the land use authority has no consultation process, you must use the process outlined in CPC-2-0-03. This includes requirements for public notification and public comment periods.
- Towers under 15m are excluded from the default process, but you should undertake consultation if the tower is highly visible or prominent.





CRTC Reporting Registered Telecommunications Providers

WISPs

- Non-dominant Carriers
- Resellers of Telecommunications Services
- Digital Subscriber Line Providers
- Resellers of High Speed Retail Internet Service
- Basic International Telecommunications Services
- Competitive Local Exchange Carriers
- Proposed Competitive Local Exchange Carriers
- Competitive Pay Telephone Service Providers
- Incumbent Local Exchange Providers
- Small Incumbent Local Exchange Carriers
- Wireless Carriers
- Full MVNO
- Proposed Full MVNO
- Other Carriers

Provider of mobile wireless services, for example, the operator of an LTE network with unique Mobile Network Code



Resellers

CRTC Reporting Registered Telecommunications Providers

- <u>Register</u> as a telecommunications provider with the CRTC
- Once you're registered, you will complete annual reports online through the <u>Data Collection System</u> (DCS)
- Reports may include information relating to:
 - Financial statements
 - Service offerings
 - Customer counts
 - Coverage mapping (already prepared for ISED broadband maps)



CRTC Reporting Benefits

- CRTC <u>Communications Monitoring Report</u> is published annually
- All data is aggregated and anonymized
- Datasets are available
- Data can influence policy





Image: CRTC website

BITS Licence Basic International Telecommunications Services

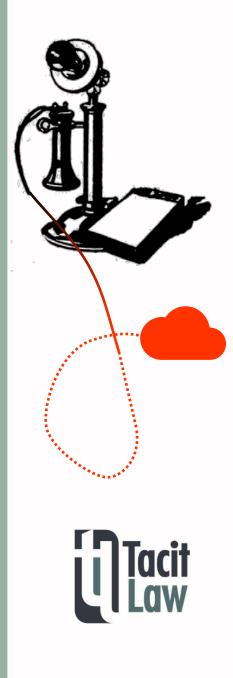
- Basic International Telecommunications Services (BITS) licenses are required to carry telecommunications traffic between Canada and any other country.
- Internet traffic crosses international borders, so all ISPs must <u>apply for a BITS license</u>, through the DCS.
- Applications for BITS licenses are posted on the Commission's website and open for public comments for a period of 30 days.
- 10-year license term





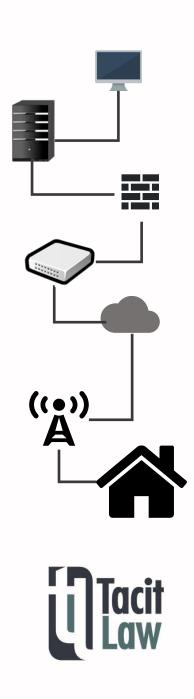
VoIP Requirements

- There are obligations associated with providing VoIP services.
- Provide customers with written notification describing the limitations of 9-1-1 emergency service over VoIP services.
- Service contract should include appropriate limitations of liability with respect to VoIP 9-1-1 service.
- Provide stickers on VoIP devices/handsets to remind the customer of 9-1-1 service limitations and customer's responsibilities.
- Service provider must submit samples of the above materials and other information (such as how 9-1-1 limitations are described in marketing materials related to VoIP services) to the CRTC in order to receive approval.



Canadian Centre for Cyber Security

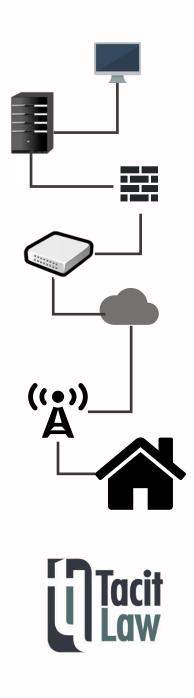
- No requirement to register or report for most WISPs
- Information and Communication Technology is one of Canada's Critical Infrastructure Sectors
- Participation in <u>Security Review Program</u> for ISPs that have deployed designated equipment in an LTE network. Equipment from Canadian or US manufacturers is not designated.
- Contact the <u>Cyber Centre</u> for more information.



Canadian Centre for Cyber Security

Network Security Plan

- Network Diagram
- Cyber-Centre Security Audit Program provides good ideas for a Network Security Plan
- <u>Canadian Security Telecommunications Advisory Committee (CSTAC)</u> Best Practices
 - Design and Architecture Considerations
 - Control and Monitoring
 - Incident Response Plan
 - and more...
- CCCS will provide you with advice and guidance to improve your network security



Workplace Health and Safety Program

- Engagement may be triggered by a federal funding award
- Telecommunications companies are federally regulated, and are supposed to have a workplace safety program in place
- Program requires that certain documentation must be in place
- Program requires that employees receive certain training
- Program requires that your company have a workplace health and safety committee
- Program requires that various forms and processes be in place
- Provincial workplace insurance requirements still apply to your business





Thank You

Enjoy the conference



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