

Canadian Electricity Association (CEA)

Reference: Consultation on the 24 and 38 Ghz Frequency Bands:
Proposed Policy and Licensing Procedures. August 1998 - DGRB-003-98

Industry Canada initiated a consultation on the referenced discussion paper for comments on a competitive process for the issuance of spectrum licences in the subject bands. Prospective licensees were encouraged to provide comments to the Department on the various issues discussed in the paper. The CEA participated in the preparation of the Radio Advisory Board of Canada (RABC) response and agrees with its position particularly with respect to lawful intercept and research and development. The Canadian Wireless Telecommunications Association response on these issues was essentially the same. We would like to follow up at this time with reply comments on the comments submitted by Clearnet that all conditions must apply equally.

Reply comments on the proposed license conditions.

Our position is that the requirement of Lawful Interception and the 2% of revenues to be invested in Research and Development (R&D) should not be applied to private users for the reasons stated in the RABC response. If a decision is made to apply the Lawful interception and R&D provisions to commercial operators then these conditions should not also be applied to private users. In addition, we believe that private users should have some access to the spectrum particularly in geographic areas where there is not enough demand to warrant auctions.

Dave Culliford
Chair
CEA Telecom Committee