



Box 70, 100 Elora St. N.
Clifford, ON N0G 1M0
Tel: (519) 327-8012 or Fax (519) 327-8010

June 26, 2007

Mr. Leonard St-Aubin
Director General,
Telecommunications Policy Branch
Industry Canada
1612A 300 Slater St.
Ottawa, ON K1A 0C8

Dear Mr. St-Aubin:

Subject: Advanced Wireless Services Consultation DGTP-002-07,
Comments of MTS Allstream Inc.

Wightman Telecom Ltd. (Wightman) submits the following comments on the Spectrum Management Notice number DGTP-002-07, Consultation on a Framework to Auction Spectrum in the 2 GHz Range including Advanced Wireless Services from Industry Canada dated February 2007.

1. Wightman is a small regional ILEC and CLEC providing telecom and data services to the residential and business markets in a number of towns and cities within the 519 NPA.
2. As such we have been pursuing a wholesale white label product for the past two years from either of the current two wireless service providers operating in Ontario. We have been completely unsuccessful in this endeavor.
3. As a SILEC Wightman has spectrum allocated to it in the 800 B band however, barriers to entry such as tower access and roaming make the use of this spectrum less than viable given our small geography.
4. Much has been said about Canada's current status in the developed countries slipping in the area of telecommunications. This was most recently addressed in the Telecommunications Policy Review Panel with specific comments related to wireless.

5. Fostering a vibrant competitive wireless industry should be a major objective of the upcoming spectrum auction and the role of small regional telco's in this process should not be ignored. Entry to this market should not be limited to national players or only those with the scale to meet auction criteria. We feel this will serve only to perpetuate the current tri/duopoly that exists today. As well the current discussions of merger between two of the current service providers will only serve to further consolidate the service providers and reduce the current level of competition even further.
6. Failure to provide access to this market to small, new entrants will put further competitive pressure on existing companies. As issues of forbearance become more prevalent and bundling of triple and quad play products become more the norm, those without access to a cellular product at either a wholesale or regional application level in an uncompetitive state due to market dominance.
7. The upcoming auction and the associated rules of the AWS spectrum are paramount to establishing a competitive market that removes the dominance of the current service providers, allows new entrants in at either a licensed or wholesale level on a scale less than national.
8. Setting aside AWS spectrum for new entrants only, mandating tower access and roaming agreements and providing for a regulated wholesale (white label) service are all key points in leveling the playing field for the upcoming auction and ensuring the objectives of the Minister are met.
9. Currently a company like Wightman has absolutely no entry point in to this market as it does not have spectrum or what it does have can not be used in an economical manner. No wholesale opportunities exist nor will they be entertained by at least two of the Big 3.

In closing Wightman urges the Government to heed the inputs of companies such as ours and others wishing to enter this market in a competitive manner and provide a set of rules for the upcoming auction that accomplished the Minister of Industries' objective "to ensure that Canada's telecommunication industry is internationally competitive and successful and is shaped to best support our ever-evolving and rapidly changing telecommunications needs".

Regards,

Tom Sullivan
General Manager.
519-327-9223
tsullivan@wightman.ca

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