11 January 2002

Mr. Michael Helm
Director General
Telecommunications Policy Branch
Industry Canada
300 Slater Street
Ottawa, Ontario
K1A 0C8

Don Woodford
Director -
Government &
Regulatory Affairs

Dear Mr. Helm:

Subject: Bell Mobility Reply Comments: Consultation on an Application to Use Mobile Satellite Spectrum to Provide Complementary Terrestrial Mobile Service to Improve Satellite Coverage - Canada Gazette - Part 1 Notice No. DGTP-009-01, dated 19 October 2001

Bell Mobility is pleased to submit the following reply comments in response to the above captioned Gazette Notice. Please do not hesitate to contact me should you have any further questions concerning these reply comments.

Yours truly,

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CANADA GAZETTE PART 1 NOTICE NO. DGTP-009-01

Consultation on an Application to use Mobile Satellite Spectrum to Provide Complementary Terrestrial Mobile Service to Improve Satellite Coverage – *Canada Gazette* – Part 1 Notice No. DGTP-009-01, dated 19 October 2001.

Reply Comments
of

Bell Mobility

11 January 2002

1. Bell Mobility is pleased to provide the following reply comments in response to the submissions filed concerning *Canada Gazette* – Part 1 Notice No. DGTP-009-01: *Consultation on an Application to Use Mobile Satellite Spectrum to Improve Satellite Coverage*, dated 19 October 2001 (the Notice).

2. Bell Mobility notes that it provided comments, in response to the Notice, on 21 December 2001.

3. Bell Mobility is also in receipt of comments, in response to the Notice, from ICO Global Communications (Canada) Inc. (ICO), Inmarsat Ltd. (Inmarsat), Mobile Satellite Ventures (Canada) Inc. (MSV), Rogers Wireless Inc. (Rogers Wireless), Telenor Broadband Services AS (Telenor), TELUS Mobility, Transport Canada and W2N Inc. (W2N).

4. Bell Mobility notes that the Department's Notice is inviting comments on a particular aspect of TMI's application, namely the proposal to deploy a digital mobile service, as in-fill or complementary service, to the mobile satellite service (MSS).

5. Consistent with its 21 December 2001 comments, Bell Mobility notes that these Reply Comments are limited to the TMI proposal and the L-band frequencies that are the subject of the Notice.

6. Bell Mobility's comments noted that the main reason for the deployment of in-fill base stations is to overcome the apparent difficulties in achieving signal penetration in urban areas and inside buildings. At page 4 of its comments, MSV confirms that "…mobile satellite users experience loss of service and signal impairment in major urban areas and inside buildings." MSV further notes that this technical obstacle, despite two decades of satellite technology advances, has proven to be both intractable and a contributor to the lack of commercial success of MSS.

7. Bell Mobility submits that such technical problems, with their resultant impact on service coverage, are a disincentive to the adoption of mobile satellite service by users in general including those in rural areas. As noted by Bell Mobility in its comments, under the arrangement proposed by TMI in its application, TMI would be able to fully deliver on its primary service mandate, i.e., wide area satellite based service to all Canadians independent of location.

8. At paragraph 13 of its comments Bell Mobility noted that it would be crucial to insure that the spectrum continues to meet its original intended use of fully delivering on its primary service mandate i.e., wide area satellite based service to all Canadians independent of location. Further, Bell Mobility was of the view that no single-mode/terrestrial-only terminals should be authorized for use on this spectrum. In this regard, MSV acknowledged at page 19 of its comments that single-mode terminals for terrestrial mobile service should not be permitted. MSV further noted that Industry Canada's conditions of licence could be employed to facilitate compliance by including the following requirements:

> First, operation of the ancillary terrestrial component must be on a no harmful interference/non-protection basis with respect to other MSS systems;
>
> Second, before an operator can provide the ancillary terrestrial service, it must have an MSS satellite in commercial service and this satellite must have been designed and constructed to have coverage of all rural and remote areas of Canada, including the far North;
>
> Third, the ancillary service must be provided on an integrated basis with the satellite MSS operation, such that call set-up and tear-down of both the terrestrial and satellite components of the service can be controlled through a single controller by the MSS operator.

9. Bell Mobility submits that, collectively, the above provisions would ensure that the ancillary terrestrial service is just that – ancillary to a satellite-primary MSS system and that the spectrum in question is still delivering on its primary service mandate.

10. In conclusion, Bell Mobility submits that the comments submitted in response to the Department's Notice demonstrate that the applicant's proposal is one which entails adding an "ancillary" terrestrial component to what remains essentially and overall a MSS system. Bell Mobility further notes that the applicant has stated its willingness to accept conditions of licence which ensure that such will be the case. Bell Mobility remains of the view that approval of the application would enable TMI to continue to fully deliver on its primary service mandate (i.e., wide area satellite based service to all Canadians independent of location) with the added ability of allowing those same Canadians to continue to receive service via their satellite phone

when they enter more cluttered urban centres. In Bell Mobility's view, such a result is clearly in the public interest and should form the basis for the Department's decision.

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