

June 14, 2009

Industry Canada
Gazette Notice
DGRB-005-09

Comments to the Gazette Notice:

Prairie Spirit School Division has been operating in the 2500-2690 band for over ten years. In that time we have been delivering high school courses to a widely dispersed group of nine high schools, scattered over approximately 6400 square kilometers of South-Central Manitoba. At the same time we have also been delivering high school courses to six Hutterian Brotherhood Colony Schools in the district, and have added a seventh colony school this past September.

We were invited in the mid-90's to participate in a Federal-Provincial Tripartite Infrastructure Agreement, as were all school divisions in Manitoba. For a variety of reasons, many school divisions chose to seek other alternatives and opted out of the original plan. We assessed a number of possible directions to take, including the trenching of fiber-optics between our schools, but quickly realized there were few sustainable choices. A wireless option was the best choice for us at the time and we elected to pursue that avenue. We also recognized that it was critical that we operate in a licensed band that afforded us some frequency protection as wireless became more widespread in its usage. At the time of its original installation in 1998, we managed a wireless network that was predominantly analog in nature. We recognized the inadvisability of continuing in this direction and, when the opportunity presented itself, we digitized the entire system in 2005.

While this is not the first time there have been discussions about the spectrum, in the past couple of months a lot of attention has been drawn to the new proposal for the Radio Spectrum as noted in Gazette Notice DGRB-005-09.

The new BRS plan being proposed has also brought on some very interesting conversation. All of this consultation is designed to bring continuity in that portion of the spectrum and allow services to be deployed in this country and more closely align with spectrum allocation internationally.

We consider this a very positive move in the industry.

In the case of Prairie Spirit School Division we are presented with a huge challenge to bring our system into alignment with the new BRS plan.

It will require, at the very least, a sizeable capital investment in order to begin to align with the new plan. Additionally, bandwidth restrictions will degrade our existing system to a point of being unusable, and would cripple our plans of improving on the services to the school division.

Should the IMT 2000 model be adopted and school divisions be expected to move to the 50Mhz portion that is proposed for use with TDD equipment, it would have serious repercussions for our system. Not only would it cut our bandwidth allocations from the current 80 Mhz to 40 Mhz, it would force the total replacement of our FDD equipment. We would, in effect, be put out of business, as we have no other recourse to funds to support the delivery of programs. Our students would incur immeasurable harm as they would not be able to take enough courses to graduate at the end of Grade 12.

Therefore, we, as an incumbent in good standing in the 2500-2690 band, expect to continue the exemption that Manitoba school divisions were granted -the "grandfather" clause and maintain offering services in the spectrum.

Should there be interest from Industry in the portion of the Spectrum we presently occupy we are prepared to explore options that would be mutually beneficial for all parties concerned

Yours truly,

for The Board of Prairie Spirit School Division
Tom Isford
IT Department