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Vice President - Regulatory

January 22, 2008

Director, Spectrum Management Operations
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Industry Canada
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Ottawa, ON
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Sent via email: aws@ic.gc.ca

Re: Canada Gazette Notice No. DGRB-010-07, DGRB-011-07, DGRB-012-07 and Policy Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range

On November 28, 2007, the Department issued a Notice entitled *Policy Framework for the Auction for Spectrum Licences for the Advanced Wireless Services and other Spectrum in the 2GHz Range* (the "Policy Framework") and a Notice entitled *Consultation on Proposed Conditions of Licence to Mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Agreements – DGRB-010-07*.

On December 13, 2007, the Department issued a Notice entitled *Update on Clarification Questions for the AWS Policy Framework and Deadline Extension for the Consultation on Proposed Conditions of Licence (DGRB-010-07) – DGRB-012-07* (the "Notice"). In the Notice, the Department indicated that it will have a process where questions may be submitted seeking clarification of the auction policy and procedures.

On December 21, 2007, the Department issued a notice titled *Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range* (the "Licensing Framework"). The Licensing Framework contained more detailed procedures relating to the operation and administration of the AWS auction.

Rogers Communications Inc ("Rogers") hereby files the following questions regarding the above noted policies, conditions of licence, licensing rules and

procedures, as stipulated in the Notice. We also hereby file our comments on the proposed conditions of licence.

Rogers wishes to note that these documents are being filed at a time of extraordinary turbulence for the financial markets, in Canada, in the United States and across the globe. This market turmoil is affecting Canada's telecommunications market including Canada's wireless communications providers.

For example, Canada's largest telecommunications company, BCE is in the process of being acquired by a consortium of purchasers. Nonetheless, the current share price of BCE is far below the purchase price for the company. This is a direct reflection of the uncertainty in the financial markets.

In addition, many analysts believe that the turmoil in the financial markets will cause a slowdown in the economy. They therefore are forecasting slower growth in the wireless markets and have lowered their ratings for Rogers and other Canadian wireless companies.

In short, the uncertainty in the global financial markets is creating uncertainty in Canada's wireless markets. This uncertainty could affect investment plans by incumbents and new entrants and could jeopardize the enviable successes that Canada's wireless market has achieved to date.

In light of these developments, Rogers urges the Department to create license conditions and policy clarifications which are based on the proven policies that the Department has used in the past. By anchoring its decisions on past precedents, the Department will reduce uncertainty and help Canada's wireless market to overcome the existing uncertainty and move forward.

Regards,

A handwritten signature in black ink, consisting of a stylized 'K' followed by a long horizontal line that curves slightly upwards at the end.

Kenneth G. Engelhart
Vice President – Regulatory
KGE/csh

Attachs.

**Questions of Rogers Communications Inc.
(Rogers)**

Canada Gazette Notice No. DGRB-010-07

Canada Gazette Notice No. DGRB-011-07

Canada Gazette Notice No. DGRB-012-07

Policy Framework for the Auction for Spectrum Licences
for Advanced Wireless Services and other Spectrum
in the 2 GHz Range.

Update on Clarification Questions for the AWS Policy Framework

January 22, 2008

The following questions relate to Section 4.1 Licence Term of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

1. The Department will conduct a public consultation 2 years prior to the licence expiry. The Department will hold an earlier public consultation to establish the rules and procedures of the second renewal consultation that takes place 2 years before the expiry. Please provide further detail regarding the earlier public consultation including its timeframe and process.
2. The Department also states “the renewal process developed through that consultation may apply to all auctioned licences, including AWS.”
 - A) Please identify all licences (PCS, Cellular, AWS and others) that will be subject to this process.
 - B) Please explain when this renewal process will commence for each type of licence identified in question 2A.
 - C) Please identify the process that the Department will use in determining spectrum licences that will be subject to the renewal process.
 - D) Please identify whether and when existing licence holders will have the opportunity to comment on the proposed renewal process.
3. One of the considerations used by the department to determine whether to renew a licence is interest in the spectrum by other parties.
 - A) How will the Department weigh or measure interest by other parties?
 - B) Also, please identify how this will impact the Department’s decision on whether or not the licence is renewed.
4. With respect to licence term, please confirm that, consistent with the *Framework for Spectrum Auctions in Canada (October 2001, Issue 2)*, licences awarded in this licensing process will have a “*high expectation of renewal for a further ten-year term unless a breach of licence condition has occurred, a fundamental re-allocation of spectrum to a new service is required, or an overriding policy need arises*”.
5. Please confirm there is no minimum 5 year roll-out requirement for licences.

The following questions relate to Section 4.2 Licence Transferability and Divisibility of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

6. Please confirm whether the Department would permit spectrum swaps of equal amounts of spectrum between licensees?
7. Please advise whether swaps between set aside and non-set aside spectrum would be permitted during the first 5 years of the licence period.

The following questions relate to Section 4.3 Eligibility Criteria of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

8. Please confirm that only entities that meet the requirements of a “radiocommunications carrier” will be entitled to participate in the AWS auction, and entities that only meet the requirements of a “radiocommunications user” will not be allowed to participate.

The following questions relate to Section 4.10 Research and Development of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

9. Please confirm whether the requirement to invest a minimum of 2% of adjusted gross revenues in eligible research and development activities is to be averaged over 5 years or whether it is to be averaged over the 10-year licence term. If 5 years, please explain the reasons for using this period.
10. Please confirm that businesses with less than \$5 million in annual gross operating revenues are not exempt from research and development expenditure requirements if they are affiliated with Cellular, PCS, or AWS businesses with greater than \$5 million in annual gross revenues.

The following questions relate to Section 4.11 Implementation of Spectrum Usage of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

11. Please explain how the Department will “take into account the roll-out targets” both in considering eventual renewal of AWS licences, and any application from a national new entrant for extension of in-territory roaming beyond the initial 5 years.
12. Please confirm that AWS licensees will be required to completely satisfy the roll-out targets in order to be deemed to have “sufficiently deployed

over the licence area” and before they will qualify for the renewal of their licences, as stated in *Policy Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range*.

13. Please explain how the Department will determine that a given licence area and population have been adequately covered by a licensee.

The following question relates to Section 4.12 Annual Reporting of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

14. With respect to annual reporting requirements.

- A) Please explain what is meant by “hub and subscriber sites”.
- B) Please clarify whether the “level of service (data rate)” that must be reported by licensees in this process is the maximum data rate that can be supported.
- C) Please confirm that the area used in reporting the “level of service” is the service area associated with the spectrum licence.

Questions 16-36 relate to Section 4.13 Mandatory Roaming and Antenna Tower and Site Sharing and Prohibition of Exclusive Site Arrangements of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07). Specifically, these questions related to *DGRB-010-07 - Consultation on Proposed Conditions of Licence to Mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements*.

15. In the conditions of licence of the current cellular and PCS spectrum licenses, it states that while Minister retains the right to amend the licence conditions, “such powers will only be exercised on an exceptional basis and only after consultation”. Please identify the special circumstances that currently exist that necessitate amendments be made to the conditions of licence in the middle of the licence term. Please also identify the consultation process that was conducted.

The following questions relate to page 3 Conditions of Licence for Mandatory Roaming of DGRB-010-07.

16. According to the draft licence conditions, status as a new entrant is based upon the definition of new entrant found in the AWS auction Policy Framework. The definition in the Policy Framework, “an entity which holds less than 10% of the national wireless market based on revenue” (pg. 5),

is specifically tied to the AWS auction, establishing the eligibility to bid upon the set-aside spectrum. Please confirm that that the definition of “new entrant” used in the licence conditions is restricted to an entity that successfully obtains licensed spectrum during the 2008 AWS auction.

17. On page 6 of the Policy Framework, it states, “Should an entity qualify as a new entrant at the time of licensing, this designation would remain valid throughout the term of its licence even if the entity is successful in growing its market share beyond 10% of the national market share based on revenue”.

Please clarify:

- A) if an entity’s status as a new entrant remains valid if it grows beyond 10% market share by obtaining other entities through mergers, acquisitions and similar methods of growth;
- B) if an entity’s status as a new entrant remains valid if it is obtained by another entity through a merger, acquisition or similar method of growth and, as a combined entity, exceeds 10% of market share by revenue.

18. With respect to mandatory roaming, please confirm that

- A) the Department will require, as a condition of licence, that all cellular, PCS and AWS licensees requesting roaming shall only offer services by means of handsets that are also capable of providing cellular, PCS and AWS in their licensed spectrum and in their chosen cellular, PCS and AWS standards.
- B) new entrants must operate a network with a mobile switching centre, home location register, radio base station, and PSTN point of interconnection, and they must have acquired a central office code for wireless telephone numbers.

19. Please confirm that a new entrant cannot seek roaming rights until they have established a network in each of their licensed service.

20. In *Consultation on Proposed Conditions of Licence to Mandate Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements (DGRB-010-07)*, the Department has indicated that digital roaming must be offered to a requesting new entrant inside its licensed areas “commencing with the date of issuance” of the new entrant’s licence. Please identify the start dates and end dates for cellular, PCS and AWS licensees that are not new entrants. .

The following questions relate to page 2 Conditions of Licence for Mandatory Antenna Tower and Site Sharing and Prohibition of Exclusive Site Arrangements of DGRB-010-07.

21. Please confirm that a licensee will not be responsible for the refusal of an antenna site landlord to permit the sharing of the site with a requesting party.
22. Please confirm that, where a request to share an antenna site is agreed upon, it will be the requesting party's responsibility to undertake any necessary public consultation requirements at its own expense.
23. Please confirm that licensees are not required to share power or site shelter space for the housing of equipment related to the operation of antenna systems.

The following questions relate to Section 5.1 Application Form of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

24. The application form requires that an applicant indicate which licences they intend to bid upon during the auction.
 - A) Does this requirement restrict a bidder to only submit bids on these licences or does the applicant retain the right to use their eligibility points on any licences, including ones which were not so indicated in the application?
 - B) Please confirm that the list of licences will not be disclosed publicly.
 - C) Please confirm that the applicant is not obliged to bid for all or any of the licenses in the first or any subsequent round of the auction.
25. Please advise specifically what information will be made publicly available, and the timing regarding the following:
 - A) The ownership structure of applicants, including the identity of any significant shareholders and, where the immediate shareholders are holding companies, the ownership structure of the holding companies;
 - B) The identity of any bidders that have been designated as 'affiliates' or 'associated bidders'; and
 - C) The reasons why particular bidders have been designated as 'affiliates' or 'associated bidders'.
26. Please confirm that when submitting the application, it is necessary to declare all options held by existing shareholders that may increase their equity participation in a bidder.

27. It is stated that a list of all applicants will be made public via the Department's web site shortly after the closing date for receipt of applications. Please advise whether the number of eligibility points and the amount of the financial deposits submitted by each applicant will also be made public at that time, or at a later date.

The following questions relate to Section 5.2 Prohibition of Collusion of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

28. Paragraph 5.2 states, "Applicants are prohibited from co-operating, collaborating, discussing or negotiating settlement agreements with competitors, relating to the licenses being auctioned or relating to the post-auction market structure, until the deadline for the final payment on high bids.
- Please:
- A) explain what is a "negotiated settlement agreement";
 - B) provide further explanation what the Department considers "post-auction market structure". What types of discussions or agreements are intended to be captured by this provision?
29. Does the prohibition of collusion rule prohibit agreements or arrangements between parties with regard to which parties will participate in the auction where these are:
- A) Undertaken prior to the application date?
 - B) Undertaken after the application date, but prior to the commencement of the auction?
30. What implications does section 47 of the *Competition Act* have for the auction process?
31. Are there agreements that are permissible under the anti-collusion rules, but which require advanced notification under the terms of the *Competition Act*? If so, identify what is permissible.
32. If a bidder agrees to offer another actual or potential bidder access to its network or spectrum that it may obtain during the AWS auction, would such an agreement be prohibited by the anti-collusion rules, or would such agreement impact the status of either party in the auction?
33. Please confirm that bidders may sell "buy options" or "buy sell options" on a particular licence, even before the licences are awarded.

- A) If yes, would any such agreement need to be disclosed to Industry Canada?
- B) Would such information be made available to all bidders, and if so when will it be disclosed to those bidders?
- C) Identify whether any such agreement if made between two bidders, is contrary to rules prohibiting collusion.

The following questions relate to Section 5.3 Participation in the Auction – Affiliates and Associated Entities of *Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07)*.

- 34. Will the Department publish a list of Affiliates and Associate Entities? If so, please advise when.
- 35. Can an a group of Canadian companies form an unincorporated association in order to bid as a single entity?
- 36. Paragraph 5.3 states that “All affiliations or associations must be disclosed at the time of the application. Please note however that any discussions or negotiations after the application deadline which create an association with competitors (i.e. any explicit or implicit agreement relating to the acquisition of the licenses being auctioned or to the post-auction market structure) during the auction process are prohibited and will be considered to be collusion. Any applicant who has formed such an Association will be disqualified from participating in the auction and may be subject to revocation of existing licences. Therefore all such contact with competitors must be suspended until the final deadline for payment on high bids.”

Please clarify:

- A) That this condition applies from the application deadline until the deadline for final payment on high bids.
 - B) That this condition will continue to apply even if the start of the auction is postponed after the application date has passed.
 - C) That all entities involved in the association will be disqualified.
- 37. If a party has an option to buy all or part of a licence from another party through an agreement made prior to the auction to operate a licence jointly;
 - A) Does this need to be disclosed to the Department submitting the application?

- B) If so, would such an agreement be disclosed to other bidders and/or made public and when? When would the disclosure take place?
- C) Would such agreements violate the rules regarding collusion?

38. If parties who are not affiliates entered into agreements prior to the auction to operate a licence jointly:

- A) Do these need to be disclosed to the Department when applying?
- B) If so, would such agreement be disclosed to other bidders and/or made public; and when would the disclosure take place?
- C) Would such agreements violate the rules regarding collusion?

The following questions relate to Section 5.3.3 Presumption of Affiliated and Associated Entity Status of *Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07)*.

39. The Policy Paper states that where one entity owns 20% or more of the voting shares of a second entity, there is a presumption that the two entities are affiliates and therefore only one would be eligible to be a qualified bidder. Each entity may file evidence to rebut that presumption.

- A) Will both entities be permitted to participate in the auction pending a determination as to the affiliate relationship?
- B) Assuming that both entities will be permitted to participate, what will be the procedure post-auction should Industry Canada determine that the two entities are in fact affiliates? What is the appeal process?
- C) Will the issuance of licences be delayed pending the determination of affiliation?
- D) If the entities are declared provisional winners in different territories, will they be permitted to be licensed?
- E) Will the entities, if they are declared provisional winners, be required to pay the fees within the time periods if no determination has yet been made with respect to the affiliate relationship? If so and the ultimate determination is that they are affiliates, will funds be returned, with interest? Will penalties apply in those circumstances?

40. Further clarification is requested regarding the criteria to be applied by Industry Canada in determining whether a company has satisfactorily rebutted the presumption that it is an affiliate of a second entity by virtue of that second entity owning 20% of its issued shares.

Please clarify that these are the primary criteria that Industry Canada will consider for purposes of making this determination:

- A) Percentage representation on board of directors;

- B) Actual control through ownership or control of more than 50% interest; and
- C) Agreements which block decision-making.

The following questions relate to Section 5.4.1 Financial Deposit of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

- 41. It is indicated that the Department reserves the right to request additional financial deposits during the auction.
 - A) Identify all circumstances under which the Department would exercise this right.
 - B) Explain what will occur if the bidder is unable to comply with the request for additional deposits within the 2 full business day limit prescribed by the Department.
- 42. Please advise whether the Department could change the date of the auction start after financial deposits are submitted on March 3, 2008.
 - A) If so, please advise whether the financial deposits would be returned to the applicants and then applicants would then be asked to resubmit at a later date.
 - B) If not, what financial compensation will be made to the applicants in terms of interest payments?
- 43. What is the maximum period of time that could elapse between submission of deposit and the start of the auction?
- 44. Please advise the timeframe for the return of an applicant's letter of credit once the auction has closed.

The following questions relate to Section 5.4.2 How to Submit the Application and Financial Deposit of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

- 45. Please describe all "exceptional" circumstances under which the Department would accept applications and associated documentation after the deadline of March 3, 2008.

The following question relates to Section 5.5 Bidder Qualification of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

46. Please advise whether the Department will announce eligibility points earlier than the qualification date, and whether the Department will publish any specific information about the amounts of financial deposits.

The following questions relate to Section 5.9 Software Requirements of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

47. Please clarify when technical information about the number, format and structure of auction data files will be made available.
- A) Is it correct to assume that these will be similar to those used for the PCS auction?
 - B) Will sample data files be provided?

The following questions relate to Section 6.1 Key Features of the SMRA Design of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

48. Please confirm that each and every licence will be available during each round of the auction.
49. Please confirm that the set aside blocks and the non set aside blocks will be auctioned at the same time.

The following questions relate to Section 6.2 Bidder Eligibility Points of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

50. The Licensing Framework states that In their application each applicant must indicate the total number of “points worth” of licences on which they wish to bid in any round and that this number defines a bidder’s initial level of eligibility points. It further states that bidder eligibility points may not be increased once the auction has started.
- A) Please clarify that it is also not possible to change your initial eligibility between the application date and the start of the auction.

- B) If this is not correct, please explain under what circumstances eligibility points may be increased after the application and deposit has been filed but the auction has not started.

The following questions relate to Section 6.3 Auction Stages of *Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07)*.

51. In section 6.3, an example of a “low activity level” is given, namely “three consecutive rounds in which new bids are placed on licences, representing ten percent or less of the total points associated with all licences up for bidding”.
52. Is this a necessary condition for moving to the second stage? Could the auctioneer move to the second stage even before this condition is met?
53. In section 6.3, it is stated that there will be at least one round’s notice of a transition to the next stage. How many rounds notices does the Department expect to give?
54. In section 6.3 of the Policy regarding moving from Stage I to Stage II, other than “...e.g. three consecutive rounds in which new bids are placed on licences, representing ten percent or less of the total points associated with all licences up for bidding.”
- A) What other criteria could be used?
- B) What criteria will be used in determining when a transition from Stage II to Stage III will occur?
- C) Will the contemplation of a stage transition be announced or will the only announcement occur when a decision to transit from one stage to another has been made?

The following questions relate to Section 6.5 Bid Increments of *Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07)*.

55. Section 6.5 explains the procedure followed for determining bid increments.
- A) What criteria will be used to determine when, and by how much, bid increments are changed?
- B) For how long in Stage I will the bid increments be at least 15% of the standing high bid?

- C) What specific criteria will be used and what process will be implemented that provides for a smooth and predictable pattern of declining bid increments on licences?
- D) Are there criteria in place to determine if the bid increment percentage will rise on a license on which there is activity? If so, what are those criteria?
- E) As bidding is non-discretionary, cutting the minimum increments will allow for more precise bidding. How quickly will bid increments drop below 15% and then down to the minimums?

The following question relates to Section 6.6 Activity Rule Waivers of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

56. In the event that a technical fault is later shown to have been beyond a bidder's control, would any waivers used for that reason be reassigned?

The following question relates to Section 6.7 Proactive Waivers of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

57. According to Paragraph 6.12, an auction in Stage Three will end when a round is completed without any bids or withdrawals being submitted and no proactive waiver is filed.

- A) Please clarify whether the auction would cease if during the round an activity waiver was used?
- B) Would the activity waiver be treated as a pro-active waiver or would a bidder have to use a second waiver to prevent the end of the auction?

The following question relates to Section 6.9 Withdrawal of Bids and Related Penalties of Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07).

58. The Licensing Framework states, "In order to deter the potential misuse of withdrawals as a signaling mechanism, or a means of unduly delaying the cessation of bidding, the Department will impose an additional penalty on a bidder if that bidder withdraws standing high bids in more than five rounds of the auction. For the sixth and every additional withdrawn standing high bid, this penalty will be equal to the greater of: (a) 2% of the value of the withdrawn standing high bid; or, (b) \$10 000, and will be in addition to the withdrawal penalty described above. This penalty will be

assessed regardless of whether the ultimate selling price of the licence is above or below the withdrawn bid.”

Please clarify whether a penalty will be imposed for the sixth and subsequent withdrawals or if the penalty is imposed for all withdrawals made in a sixth and subsequent rounds in which the bidder submits withdrawals. In the second instance, a bidder is permitted to make one or more withdrawals in up to five rounds without any additional penalties, but will be penalized on any further withdrawals that in submits in further rounds (regardless of how many withdrawals it submitted in the first five rounds where it submitted withdrawals).

The following question relates to Section 6.12 Cessation of Bidding of *Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07)*.

59. What types of exceptional circumstances would lead to the final round of the auction?

The following questions relate to Section 7.5 Issuance of Licenses of *Licensing Framework for the Auction for Spectrum Licences for Advanced Wireless Services and other Spectrum in the 2 GHz Range (DGRB-011-07)*.

60. What maximum period of time will be required by the Department to complete its Ownership and Control determination for a given carrier?

61. Will the Department provide interest payments to the successful bidder for the period of time between the payment of the fees and actual receipt of the spectrum licence?

General

62. Identify the complaint and escalation process that is in place for bidders to submit complaints or concerns regarding the deviation from the rules and policy during the bid process.