



CCSA

Canadian Independent Communications

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Regulatory

BY E-MAIL: wireless@ic.gc.ca

May 25, 2009

Mr. Leonard St-Aubin
Director General
Telecommunications Policy Branch
Industry Canada
16th Floor
300 Slater Street
Ottawa, Ontario
K1A 0C8

Dear Mr. St-Aubin:

Re: Consultation Paper on the Possible Use of the Extended-Ku Spectrum Bands for Direct-to-Home (DTH) Satellite Broadcasting Services, DGTP-003-08; Reply Comments

1. The Canadian Cable Systems Alliance (CCSA) is pleased to provide these reply comments in response to Industry Canada's Consultation Paper on the Possible Use of the Extended-Ku Spectrum Bands for Direct-to-Home (DTH) Satellite Broadcasting Services, DGTP-003-08, issued December 2008.
2. CCSA has reviewed the comments submitted by various parties on whether use of the Extended-KU Spectrum Bands should be permitted for Direct-to-Home broadcasting services. In our opinion, the file is substantially complete and there is no further need for additional process.
3. In fact, there is some urgency in resolving this matter so that more broadcasting services can be made available to Canadians living in rural Canada and served by small independent cable companies.

4. As CCSA stated in its April 17, 2009 submission, most of our Member Companies depend on Shaw Broadcast Services to receive distant conventional television signals and the signals of specialty television services. Given that the Shaw Broadcasting's Satellite Relay Distribution Undertaking (SRDU) platform is shared with the Shaw Direct (Star Choice) platform, unless the capacity available to the DTH service is expanded, it will be impossible for small SRDU-dependent cable companies and their customers to obtain more services.
5. The demand for High Definition services, which require significantly more bandwidth than Standard Definition services, is increasing rapidly and Canadians in rural and remote areas of the country should have access to those services comparable to that enjoyed by Canadians who in the urban centres.
6. In addition, some conventional broadcasters are considering closing their local over-the-air stations. Should that occur, customers in those communities would require feeds of these networks from other centres. Small cable companies will be able to respond to that demand only if they can obtain those signals by satellite delivery.
7. While Bell TV also holds an SRDU license and has greater available capacity to offer High Definition and other services, CCSA Members have invested substantially in headend technology that is not compatible with Bell TV's delivery system. In addition, for small systems that use the HITS and HITS QT technologies, only SBS offers authorization services for the set-top boxes required for these small operators to offer digital services. Consequently, Shaw Broadcast Services is the dominant provider of SRDU services to CCSA Members.
8. We strongly believe, particularly in light of the recent auction that resulted in a large amount of additional spectrum being made available for wireless services, none of which has yet been put to use, that it would be in the public interest to repurpose the small amount of spectrum the in Extended-KU Band for broadcast use. The immediate benefit would far outweigh the value of any long-term potential wireless applications.
9. CCSA appreciates and thanks the Industry Canada for the opportunity to submit these comments.



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Sincerely,

Christopher J. Edwards
Vice-President, Corporate & Regulatory Affairs

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