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Mobilexchange Spectrum Inc.

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April 28, 2008

Mr. Michael D. Connolly
Director General
Radiocommunications and
Broadcasting Regulations Branch
Industry Canada
300 Slater Street
Ottawa Ontario
K1A 0C8

Dear Mr. Connolly:

Subject: Gazette Notice DGRB-001-08 – Consultation on the Renewal of 24 and 38 GHz
Spectrum Licenses and Spectrum Licence Fees for 24, 28 and 38 GHz Bands

Mobilexchange Spectrum Inc. (MSI) requests, for the reasons listed below, that the consultation process be amended to include a reply comment round.

This Consultation is addressing renewal of Spectrum Licenses obtained through an Auction process for the first time and contains complex business, technical and operational issues that will impact MSI's and other Licensees' operations.

In addition, the decisions made following the Consultation will set permanent precedence and affect future renewals of licenses obtained in an auction process. It is therefore important that the consultation process will accommodate the ability of the participants to test the soundness, suitability and practicality of the initial comments of the parties.

Therefore, a reply comment round, a common practice in industry consultations through public notices, will help the department gain greater appreciation and understanding of the issues.

In addition, MSI respectfully requests an extension of two weeks to the June 5, 2008 initial submission date to allow sufficient time for research and a two week period for the reply comments following posting of the initial comments by the department.

Regarding timing MSI submits that the 4 weeks delay will have little, if any, consequence in the overall renewal process which will come into effect only in 2010, but will introduce the opportunities to have a greater in-depth consideration of the issues.

Yours truly



Mike Kedar
President
c.c. Heather Hall