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June 30, 2009

Peter Hill  
Director, Spectrum Management Operations  
Industry Canada  
Radiocommunications and  
Broadcasting Regulatory Branch  
300 Slater Street  
Ottawa, Ontario  
K1A 0C8

**RE :        Gazette Notice DGRB-002-09 – Consultation on the Renewal of Cellular and  
              Personal Communications Services (PCS) Spectrum Licences – Reply  
              Comments of Quebecor Media Inc. (QMI)**

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Dear Mr. Hill,

QMI, on behalf of itself and its wholly-owned affiliate Videotron Ltd. (Videotron), and in accordance with the procedures set out in Gazette Notice DGRB-002-09 as amended by Gazette Notice DGRB-009-09, is pleased to provide the following reply comments on the matter of the renewal of cellular and PCS spectrum licences.

Our reply comments are limited to two issues raised in the May 29, 2009 comments of Rogers Communications Inc. (Rogers), namely the duration of out-of-territory mandated roaming, and the desirability of applying a spectrum aggregation limit to upcoming releases of additional spectrum. In our respectful opinion, neither of these issues is properly addressed in the current consultation.

#### Mandatory Out-of-Territory Roaming

At paragraphs 47 to 50 of its May 29, 2009 comments, Rogers alleges among other things that the current condition of licence requiring that roaming must be provided to “all cellular, PCS and AWS licensees outside of their licensed area, for at least the 10-year term of the AWS licences” (emphasis added by Rogers) is unclear. Rogers then suggests that this lack of clarity will reduce any incentive new entrants may have to invest in their own facilities.

Rogers’ argument suffers from the failing that, outside of its licensed territory, a new entrant has no facilities to build. Clearly, the motivation for the mandated provision of out-of-territory

roaming, both now and in the future, must relate to something other than the timing of new entrant facility construction. A desire to ensure that all Canadian wireless subscribers have access to wireless services throughout the country, regardless of their choice of service provider, would appear to be a more likely motivator.

In any event, QMI submits that the logical time to discuss the duration of mandated out-of-territory roaming would be as the initial ten-year licence terms of the new entrants are coming to an end. No decision on this matter need be taken at this time.

#### Mobile Spectrum Aggregation Limit

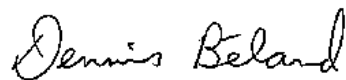
At paragraph 31 of its comments, Rogers supports the Department's proposal to remove the existing cellular/PCS condition of licence related to a mobile spectrum aggregation limit, or spectrum cap. This proposal is a purely clerical matter which flows from the August 27, 2004 decision by the Minister of Industry rescinding the spectrum cap then in effect. Bell Mobility Inc. and TELUS Communications Company offered similar expressions of support.

However, at paragraphs 32 to 35 of its comments, Rogers goes on to recommend against the imposition of a spectrum cap as part of any future spectrum release. In support of this recommendation, Rogers provides a brief overview of certain wireless data consumption trends.

Once again, QMI respectfully submits that this discussion is premature. Any meaningful discussion on whether to impose a spectrum cap in the future should involve a much more fulsome survey of service bandwidth requirements, technological capabilities, international comparisons, and competitiveness metrics. The proper time to engage in such a debate would be in the context of a new spectrum release. No decision on this matter need be taken at this time.

Trusting this is satisfactory, we remain,

Yours truly,



Dennis Béland  
Director, Regulatory Affairs, Telecommunications  
Quebecor Media Inc.

cc : Dawn Hunt, Rogers