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Dawn Hunt

Vice-President
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November 20, 2006

Ms. Heather Hall
Manager, Emerging Networks Emailed to: spectrum_pubs@ic.gc.ca
Radiocommunications and Broadcasting
Regulatory Branch
Industry Canada
300 Slater Street, 15th Floor
Ottawa ON K1A 0C8

Dear Ms. Hall:

**Re: Comments - *Canada Gazette* Part I Notice: DGRB-002-06
Spectrum Licence Fees for Broadband Public Safety in the Band
4940-4990 MHz**

Pursuant to the procedures provided in *Canada Gazette*, Part I, Notice DGRB-002-06 (the Notice), dated October 20, 2006, Rogers Wireless Partnership (Rogers) is pleased to file the following comments.

In the Notice, the Department has proposed a spectrum licence fee for the frequency band 4940-4990 MHz, which has been designated for Broadband Public Safety services. Specifically, the Department has proposed a fee of \$0.004166 per 50 MHz, subject to a minimum fee of \$250.00.

While the proposed fee is significantly lower than the fees that are paid for Cellular, Personal Communications Services (PCS), Multipoint Communications Systems (MCS), Fixed Wireless Access (FWA) and Wireless Communications Services (WCS) spectrum, the Department has stated that it believes that a significantly lower fee is warranted since the spectrum will be licensed on a non-exclusive basis. The

Department has also stated that it believes that the proposed fee reflects the fair economic rent and that it will promote efficient spectrum use.

Rogers agrees in principle with the notion of a lower fee for a non-exclusive licence and that a fee reflecting the fair economic rent should be applied for spectrum that is licensed, even though the spectrum will be used for public safety services. Rogers agrees that the application of such a fee will contribute to the efficient use of the spectrum by the licensees. Rogers does not believe that this spectrum should be licensed for free.

Rogers appreciates this opportunity to provide its comments to the Department. Please do not hesitate to contact the undersigned if you have any questions regarding our position.

Sincerely,



Dawn Hunt
DH:jt