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Vice President, Regulatory
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MTS Allstream

16 March 2015

by Email

Ms. Lynne Fancy
Senior Director
Spectrum Development and Operations
Industry Canada
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Dear Ms. Fancy:

Subject: Notice No. DGSO-001-15, Consultation on Changes to the Definition of Competitive and User-Defined Service Areas for Spectrum Licences, Canada Gazette Vol. 149, No. 10, 7 March 2015 – MTS comments

1. Pursuant to the procedure set out in Notice No. DGSO-001-15, *Consultation on Changes to the Definition of Competitive and User-Defined Service Areas for Spectrum Licences*, issued 7 March 2015 in Canada Gazette Vol. 149, No. 10, MTS Inc. (MTS) provides the following comments.
2. In DGSO-001-15, Industry Canada (IC) has proposed to modernize Canada's spectrum management system, transitioning from the current hexagonal grid cell system for identifying spectrum licence areas to a square grid cell system aligned to latitude and longitude boundaries. MTS welcomes this proposal and is supportive of IC's approach.
3. Moving to a square cell basis based on latitude and longitude will simplify mapping and boundary definition for current and future licence holders. In freezing the population values for existing spectrum licenses and grandfathering the few towers affected by the changes in licence area boundaries, IC has set forth a plan to smooth the transition and ensure minimal impact on existing license holders.
4. With regards to IC's specific questions:

Question 1:

Freeze the existing population values for all existing spectrum licences for the remainder of the licence term.

Question 2:

Apply new population values based on square grid cells when calculating fees for a new spectrum licence, when changes are made to modify the service area of an existing spectrum licence (e.g. subdivision) or when a new fee order is established.

5. MTS supports IC's proposal to freeze the population values for existing spectrum licenses and only apply new population values when issuing new spectrum licences or modifying existing licenses. This approach will ensure minimal disruption to existing license holders and provide clarity for future licence holders.

Question 3:

Sites that fall outside of the new service area but that are within the original licence area will be grandfathered. Licensees can continue to offer services to customers that are within the original licence area, but outside of the new area defined by square grid cells.

Licensees are reminded that it is a condition of licence to update site information and that it must be updated prior to March 31, 2015, if their applicable sites are to be considered under this grandfathering provision. A revised list of grandfathered sites will be published prior to implementation of the grid cell changes. Sites not included on the list are not subject to the grandfathering provision and would be considered non-compliant if they are located outside their existing or new service area.

6. MTS agrees that the few sites that fall into new licence areas should be grandfathered.

Question 4:

Require licensees to meet the specified PFD at the new service area boundary or coordinate with the adjacent licensee if a licensee makes changes to an existing station

7. MTS agrees that existing power flux density limits should apply at the new service boundaries. This again will minimize any disruption that may be caused by the transition.

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8. MTS also agrees that should a licensee modify a station that exceeds its power flux density limits or is not coordinated with the adjacent licensees, the licensee should either coordinate with adjacent licensees or make changes to meet the specified limits for the new boundary.

Yours truly,



for Russ Friesen
Vice President, Regulatory Affairs

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