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Via email: spectrum.operations@ic.gc.ca

Lynne Fancy
Senior Director,
Spectrum Development & Operations,
Industry Canada,
300 Slater Street (JETN 15th Floor),
Ottawa, Ontario K1A OH5

Re: Canada Gazette Notice No. DGSO-001-15 Consultation on Changes to the Definition of Competitive and User-Defined Service Areas for Spectrum Licences

Rogers Communications is pleased to provide its comments in response to Canada Gazette Part I, March 7, 2015, Consultation on Changes to the Definition of Competitive and User-Defined Service Areas for Spectrum Licences – (DGSO-001-15).

In the above noted consultation paper, the Department informs stakeholders that it plans to change the definition of spectrum grid cells such that the current 25 km² hexagon grid cell will be replaced with a 1 minute x 1 minute square grid cell. The Department assures stakeholders that there will be minor deviations to the current service areas resulting in population covered by service area, geographic area where sites can be located and the applicable boundaries to calculate power flux density (PFD). The Department states that the variations in area size and population per licence area will be very small (less than plus or minus 1.5% per licence area in almost all cases). Only a small number of sites (7 of more than 24,000 sites) will be located outside the licensee's new service area and not located within an adjacent area also held by the licensee. The Department indicates that none of the affected sites are associated with Rogers' spectrum licences.

The Department proposes to freeze the existing population values for all existing spectrum licences for the remainder of the licence term. The Department also proposes to 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 or when a new fee order is established.

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 the square grid

cells. Licensees will be required 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.

Rogers does not object to the Department's proposals.

Rogers thanks the Department for the opportunity to provide input on this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Ken G. Engelhart', written in a cursive style.

Kenneth G. Engelhart
Senior Vice President - Regulatory
KE/jt