

SaskTel Comments:

Gazette Notice DGSO-001-15

Consultation on Changes to the
Definition of Competitive and User-Defined
Service Areas for Spectrum Licences

March 16, 2015

INTRODUCTION

1. The following represents Saskatchewan Telecommunications' ("SaskTel's") Comments in response to DGSO-001-015, *Consultation on Changes to the Definition of Competitive and User-Defined Service Areas for Spectrum Licences* ("the Consultation").
2. The section numbering of the remainder of this document corresponds to the numbering of the consultation paper released by the Department. Failure to address any particular issue or item, or the Comments made by any other party, should not be construed as agreement with those Comments where such agreement is not in the interests of SaskTel.

SASKTEL RESPONSE TO THE CONSULTATION

5. Affected Elements and Proposed Mitigation

5.1 Population – Coverage and Associated Fees

Industry Canada is seeking comments on its proposals:

1. **Freeze the existing population values for all existing spectrum licences for the remainder of the licence term.**
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.**
3. SaskTel agrees with the proposal to freeze the existing population values for all existing spectrum licences for the remainder of their licence terms, and only apply the new population values based on the new square grid cells upon issuance of a new spectrum licence, and/or the modification of a service area through subdivision, or when a new fee order is established for spectrum licences.
4. SaskTel notes that the Department has made every effort to align the new service area boundaries based on square grid cells with the existing service area boundaries based on hexagonal grid cells. SaskTel believes this is the best approach to minimize disruptions in licensing that might result in unnecessary network modifications and deployment changes.

5. Although the proposed population changes are small, the proposed staggered implementation approach would avoid the administrative burdens and overhead created if large numbers of spectrum licences needed to be modified and re-issued in a short period of time.

5.2 Location of Deployed Sites

Industry Canada is seeking comments on its proposal:

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. SaskTel notes that the Department only expects a small number of sites across the country to be affected by a service area change upon implementation of the new square grid cells. SaskTel agrees with the proposal to grandfather those few sites that will fall outside of their original service area upon implementation of the square grid cells.
7. Grandfathering is the most reasonable approach given the high costs of relocating these sites, along with necessary changes to other sites within each area to accommodate a network site relocation. Mobile networks are designed on a regional basis, with interactions between sites being carefully managed. Relocating one site will usually require changes to other sites in the area to preserve network performance and customer experience.
8. SaskTel notes the deadline of March 31, 2015 for updating and uploading site information to the Industry Canada database.

5.3 Technical Considerations

Industry Canada is seeking comments on its proposal to:

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.

9. SaskTel believes that the efforts of the Department to closely match the service area boundaries defined by square grid cells with the existing service area boundaries will not result in significant differences in power flux densities (PFD) levels at service area boundaries compared to the existing boundaries.
10. Therefore SaskTel agrees with the proposal to align the PFD limits with the new service boundary, and the proposal that no changes be required to existing systems unless the licensee modifies a station that is exceeding the PFD limit or is not coordinated with the adjacent licensee. Licensees would be required to meet the specified PFD at the new service area boundary or coordinate with the adjacent licensee if a licensee makes any changes to an existing station.

CONCLUSION

11. SaskTel is committed to providing a high quality customer experience for users of our wireless broadband networks, while still ensuring coexistence with other wireless network service providers, and other spectrum users. Network design and optimization is complex at the best of times, and SaskTel agrees that the best approach to implement the new square spectrum grid cells required as part of the spectrum management modernization project is to minimize disruptions and changes in spectrum licensing as much as possible.
12. Moving sites simply because of a need to change to square spectrum grid cells is not a reasonable burden to place on network operators. SaskTel agrees with the approach of grandfathering any existing sites that may become part of a neighbouring service area due to a boundary change when the square spectrum grid cells are implemented.
13. Lastly, SaskTel believes that the best approach is to closely match as much as possible the existing spectrum licence boundaries, and to gradually transition the

minimized changes only as new licences are issued, and/or changes are made by network operators requiring coordination between operators.

14. SaskTel thanks the Department for the opportunity to provide input into these crucial matters. It is our hope that our comments will assist in a fuller view of the requirements for effective spectrum licensing in all regions of Canada.