



**W.N. (Bill) Beckman** 2121 Saskatchewan Drive  
Senior Director - Regina, Saskatchewan  
Regulatory Affairs S4P 3Y2

Telephone: (306) 777-4208  
Fax: (306) 565-6216  
Internet: document.control@sasktel.com

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*via E-mail*

Director, Broadcast, Coordination and Planning  
Spectrum Management Operations Branch  
Innovation, Science, and Economic Development Canada  
235 Queen Street, 6<sup>th</sup> Floor  
Ottawa, ON K1A 0H5

Dear Director,

**Re: SaskTel Reply Comments regarding Gazette Notice DGSO-001-19,  
Consultation on Periodic Adjustments for Radio and Spectrum Licence  
Fees and Fees Related to Equipment Certification Services**

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Saskatchewan Telecommunications (SaskTel) is pleased to submit our reply comments in response to the above referenced consultation regarding periodic adjustments to radio and spectrum licence fees and fees for equipment certification.

After a review of the comments submitted by others, and given the wide variety of radio spectrum users, SaskTel still believes that the most appropriate fee escalator model is the use of the Consumer Price Index (CPI) as proposed by the Department in the Consultation. The CPI is widely used as an economic indicator, is an average measurement of the economy, and is the closest approximation available that can be used to provide an escalation rate for licence fees for the wide variety of radio and spectrum licence holders.

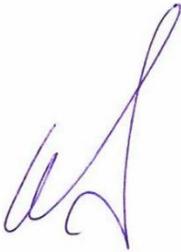
Some commenters (Shaw Communications Inc., Xplornet Communications Inc.) suggested that the annual increases be capped or limited to a maximum annual increase. SaskTel agrees that a limit on the maximum annual fee increase should be included in the Department's fee escalator model. This limit will reduce the impact of large licence fee increases on smaller wireless operators in the event of high increases in the consumer price index. SaskTel does not have any input at this time on the amount of this limit.

In summary, SaskTel agrees with the Department's proposal in the Consultation to utilize the Consumer Price Index (CPI), with the inclusion of a pre-established limit or

cap on annual fee increases, as the measure to adjust radio and spectrum licence fees on an annual basis to meet the requirements of the *Service Fees Act*.

SaskTel thanks the Department for this opportunity to provide reply comments and input into the consultation process.

Sincerely,

A handwritten signature in blue ink, appearing to be 'W.N. Beckman', with a large, stylized flourish extending upwards and to the right.

W.N. (Bill) Beckman  
Senior Director - Regulatory Affairs  
RAB/nb