



Canadian Satellite and Space Industry Forum
Forum de l'industrie spatiale et satellitaire canadienne

March 28, 2013

Mr. Peter Hill
A/Director General, Spectrum Management Operations Branch
Industry Canada
300 Slater Street
Ottawa Ontario K1A 0C8

Via e-mail spectrum.operations@ic.gc.ca

Subject: **Canada Gazette No. DGSO-002-13: Consultation on Considerations relating to Transfers, Divisions and Subordinate Licensing of Spectrum Licences**

Dear Mr. Hill:

The Canadian Satellite and Space Industry Forum (CSSIF) is an association of Canadian satellite operators and producers of satellite systems and components. Its mandate is to participate in the development of spectrum policy and regulations in areas of interest to the Canadian satellite community.

Currently, the Department issues spectrum licences in the mobile-satellite service (MSS) and the broadcasting-satellite service (BSS). Further, in Gazette Notice SMSE-003-12, *Consultation on the Licensing Framework for Fixed-Satellite Service (FSS) and Broadcasting-Satellite Service (BSS) in Canada*, the Department sought comments on also issuing spectrum licences in the FSS.

The CSSIF thanks the Department for the opportunity to comment on Consultation DGSO-002-13 ("the Consultation"). In this regard, the CSSIF notes the following text in the *Intent* section of the Consultation: "*The intent of this consultation is to elaborate and seek views on the approach used by Industry Canada, which will be applied with respect to all spectrum licences...*" (emphasis added). However, the remainder of the Consultation appears to deal only with terrestrial licences and the associated CPC-2-1-23.

The CSSIF believes that many of the issues relevant to terrestrial spectrum licences do not apply to spectrum licences in the satellite services. Accordingly, the CSSIF requests that the results of the Consultation not be considered applicable to spectrum licences in the satellite services. Further, the CSSIF suggests that any proposed changes applicable to spectrum licences in the satellite services be the subject of a separate consultation.

Yours sincerely,

David Lewis,
Chairman

cc: John Forsey, Telesat
Scott Gibson, Ciel
Stephen Acker, Faskens