

April 3, 2013

Director, Spectrum Management Operations
Industry Canada
300 Slater St.
Ottawa, ON
K1A 0C8

Re: Canada Gazette, Part I, March 16, 2013 DGSO-002-13 – Consultation on Considerations Relating to Transfers, Divisions, and Subordinate Licensing of Spectrum Licenses,

Re: 6-4 The current review model, which is confidential, and whether it should be modified such that Industry Canada would publicize a spectrum licence transfer request and provide an opportunity for third party input.

We feel that revising the review model to both publicize a transfer request and provide the opportunity for third party input would be an important move to allow Industry Canada of better meeting its policy objective set out in the 2007 *Spectrum Policy Framework for Canada* (DGTP-001-07). The ability to transfer licenses provides an important economic function by ensuring that licenses will tend to be owned by those who value them most subject to the licensing conditions set forth by Industry Canada. However, in addition to the economic dimension of spectrum licenses transfers, Industry Canada must also be mindful of how to maximize the social benefits of spectrum use. By publicising transfer requests and allowing for third party comments the department can ensure that license transfers fulfill both social and economic functions. Furthermore, allowing third party comment would also further *Spectrum Policy Framework Enabling Guideline (E)* which underscores the importance of open, transparent and reasoned regulation. Specifically, the inclusion of third party comments will ensure that interested and affected parties who are not party to the potential license transfer will have the opportunity to provide comment. These comments should aid the department in regulating spectrum and ensuring that Canadians do receive the maximum economic and social benefit that is generated by spectrum use.

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