

**Innovation, Science and  
Economic Development Canada**

**Spectrum Management and Telecommunications**

**Canada Gazette, Part 1, November 2018**

**Notice No. DGSO-002-18**

***Consultation on a New Set of Service Areas for  
Spectrum Licensing***

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**Reply Comments**

**of**

**Xplornet Communications Inc.**

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**March 21, 2019**

## **INTRODUCTION AND EXECUTIVE SUMMARY**

1. Xplornet Communications Inc. (“Xplornet”) has reviewed comments filed by interested parties with respect to the *Consultation on a New Set of Service Areas for Spectrum Licensing* (“Consultation”) currently being undertaken by Innovation, Science and Economic Development Canada (“ISED”) and is pleased to provide the present reply comments.
2. A new set of tier 5 service areas is needed to ensure spectrum is licensed in a manner that allows it to be effectively leveraged to meet the unique needs of both rural and urban Canadians. By including both rural and urban geographies within the same licensing areas, tier 4 licensing has prevented rural Canadians from properly benefitting from Canada’s spectrum resources. Indeed, tier 4 licensing has resulted in the prioritization of spectrum deployments by large mobile wireless providers that seek to serve urban Canadians and prevented smaller rural and regional providers from gaining access to spectrum to meet the needs of rural Canadians. The end result has limited the telecommunications services available in rural Canada.
3. In the present proceeding, ISED has the opportunity to create a new set of licensing areas that address the failure of tier 4 licensing to serve the needs of both urban and rural Canadians. By creating a new set of licence areas that separate rural and urban areas, ISED can promote the use of spectrum to meet the unique needs of Canadians in different geographic regions, furthering the objective of the Spectrum Policy Framework for Canada (“SPFC”).
4. Xplornet maintains its view that ISED should adopt Option 2 in creating a new set of tier 5 service areas. We further maintain our recommendation that Option 2 should be modified to only license large and medium population centres as separate licensing areas. No other proposal effectively separates rural and urban Canadians in order for spectrum to be leveraged to serve their unique needs.
5. A modified Option 2 represents the least amount of regulatory intervention that is required to effectively address the failure of tier 4 licensing to meet the needs of rural and urban Canadians. A modified Option 2 would best serve Canadians while minimizing any additional complexity imposed on service providers.

## **THE DESIGN OF A NEW SET OF TIER 5 LICENCE AREAS MUST ADDRESS THE NEEDS OF RURAL AND URBAN CANADIANS**

6. In the Consultation, ISED proposed six design principles that would guide the creation of a new set of tier 5 licensing areas:
  - 1) Recognize geographic differences: consider the unique characteristics of urban and rural areas in Canada;
  - 2) Foster demand: areas should have either a population base or some economic value to support commercial viability;

- 3) Maintain technological and competitive neutrality: not favouring or discriminating against one technology or group of stakeholders over another;
  - 4) Ensure boundaries are in low population areas to minimize potential interference issues;
  - 5) Ensure areas nest within the existing tier 4 service areas to maintain continuity with ISED's existing licensing structure; and
  - 6) Use ISED's existing grid cells as constituent building blocks.
7. Parties who have filed comments have provided considerable discussion about how these principles can be best met. Some parties have supported ISED's proposed Option 1, which draws tier 5 boundaries based on Statistics Canada's Census Sub-divisions ("CSDs"), as the method to best promote the design principles. Other parties have supported ISED's proposed Option 2, which draws boundaries based on Statistics Canada's population centres. Other parties have proposed alternative models. In all circumstances, parties have argued how their preferred design advances ISED's design principles. There is no design that can individually maximize all of ISED's design principles.
8. In creating a new set of tier 5 licensing areas, Xplornet submits that ISED should implement a design that best promotes its first design principle – to recognize geographic differences and consider the unique characteristics of urban and rural areas of Canada. As discussed below, it is this principle that has necessitated the need for a new set of tier 5 licence areas to be created. Accordingly, if the design of a new set of tier 5 licensing areas does not prioritize this principle, the result of this Consultation will be to perpetuate the characteristics of tier 4 licensing that prevent rural and urban Canadians from properly benefiting from Canada's spectrum resources.

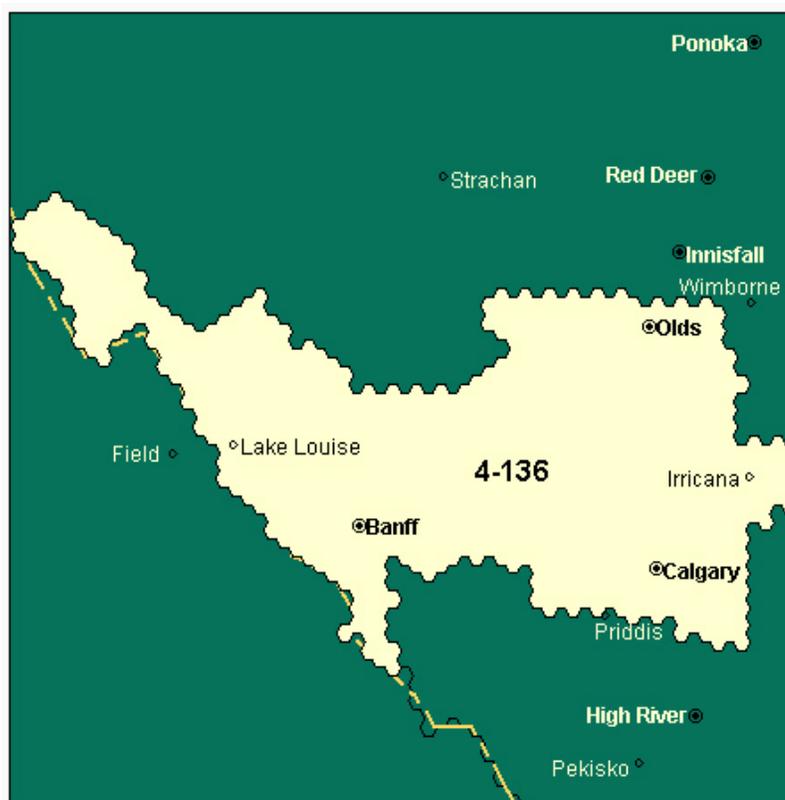
#### **TIER 4 LICENSING FAILS TO MEET THE NEEDS OF BOTH URBAN AND RURAL CANADIANS**

9. The creation of a new set of tier 5 service areas is needed to ensure spectrum is licensed in a manner that allows it to be effectively leveraged to meet the unique needs of both rural and urban Canadians.
10. Tier 4 licensing areas were not created with these unique needs in mind. By covering both rural and urban geographies within the same tier 4 licensing areas, rural Canadians have not properly benefitted from Canada's spectrum resources, as spectrum licensing and deployments have been driven by the needs of urban Canadians.
11. Indeed, regional and rural providers, like Xplornet, have not been able to gain access to spectrum in order to serve rural residents with needed services, like fixed-wireless broadband. Tier 4 licensing has been driven by urban considerations, with large providers purchasing spectrum in order to serve urban environments with mobile wireless services, without deploying services to rural

Canadians within the licence area. In this manner, tier 4 licensing has failed to meet the needs of both urban and rural Canadians.

12. This phenomenon can be seen in every tier 4 licence areas across the country. In our Comments of February 19, 2019 (“Comments”), we provided the example of the tier 4 licensing area associated with the Greater Toronto Area (“GTA”)/Hamilton. This highly urban licence area also covers many rural areas that have not properly benefitted from wireless deployments.
13. To provide an additional example, we may point to the tier 4 licensing area associated with Calgary, reproduced in Figure 1 below.

**Figure 1: Tier 4 Licensing Area 4-136 - Calgary**



14. The Calgary licensing area includes territory spanning through Banff and Lake Louise all the way to the British Columbia border. This means that in order to obtain spectrum to serve rural residents within this licence area, regional and rural providers, like Xplornet, must bid against large providers who require spectrum in this tier to serve downtown Calgary with mobile wireless services. In these situations, the regional/rural provider will always lose, as the value of the spectrum is beyond the business case of the regional/rural provider that is not seeking to serve the urban core.

15. As the business case of the large provider is based on providing mobile wireless services in urban areas, and not on serving rural areas of the licence area, rural Canadians lose out.
16. Indeed, rural municipalities that have participated in this proceeding have encouraged ISED to adopt a new tier 5 design that best supports the delivery of broadband service in rural areas.<sup>1</sup>
17. In creating a new set of tier 5 licence areas, ISED must strive to facilitate both the business cases of the large providers seeking to serve urban centres, and the regional/rural providers seeking to serve outside urban areas. By separating these unique serving territories, both rural and urban Canadians will properly benefit from Canada's spectrum resources.

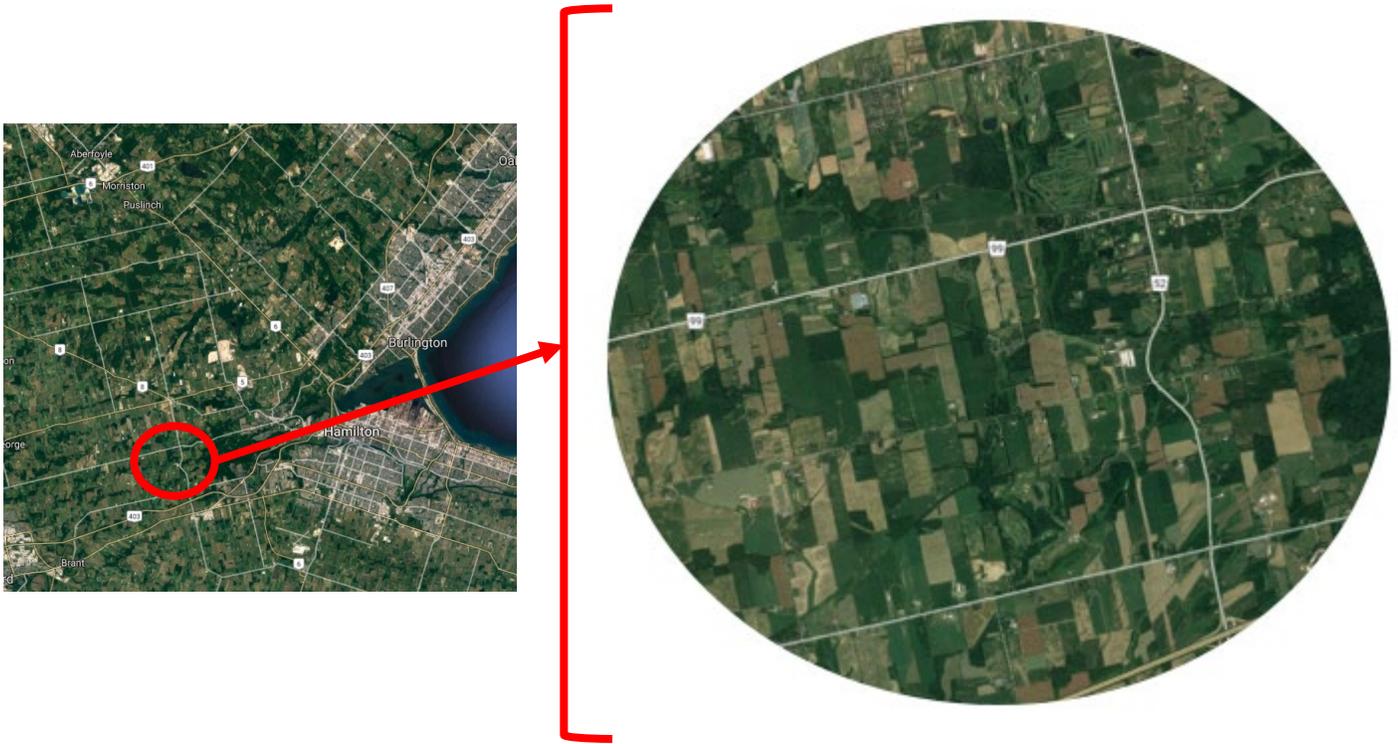
### **A MODIFIED OPTION 2 BEST ADDRESSES THE NEEDS OF ALL CANADIANS**

18. In our Comments, we supported the adoption of Option 2 because it best separates urban centres from surrounding rural areas and thus most effectively addresses the problems with tier 4 licensing that must be resolved through the creation of a new set of tier 5 service areas.
19. In order to effectively separate rural and urban Canada to allow spectrum to meet the needs of rural and urban users, licensing area boundaries must be carefully drawn. As we demonstrated in our Comments, the shift from urban to rural populations happens very quickly around Canadian cities – nearly all Canadian cities are immediately surrounded by low-density, rural areas. We provided a specific example, reproduced as Figure 2 below, associated with Hamilton, in our Comments. A similar illustration could be provided for numerous other Canadian cities, including St. John's, Halifax, Quebec City, Montreal, Ottawa, Winnipeg, Saskatoon, Calgary and Edmonton.

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<sup>1</sup> Rural Municipalities of Alberta, page 2; Saskatchewan Association of Rural Municipalities, page 2.

**Figure 2: Low-population-density areas are immediately adjacent to many major centres: Hamilton, ON**



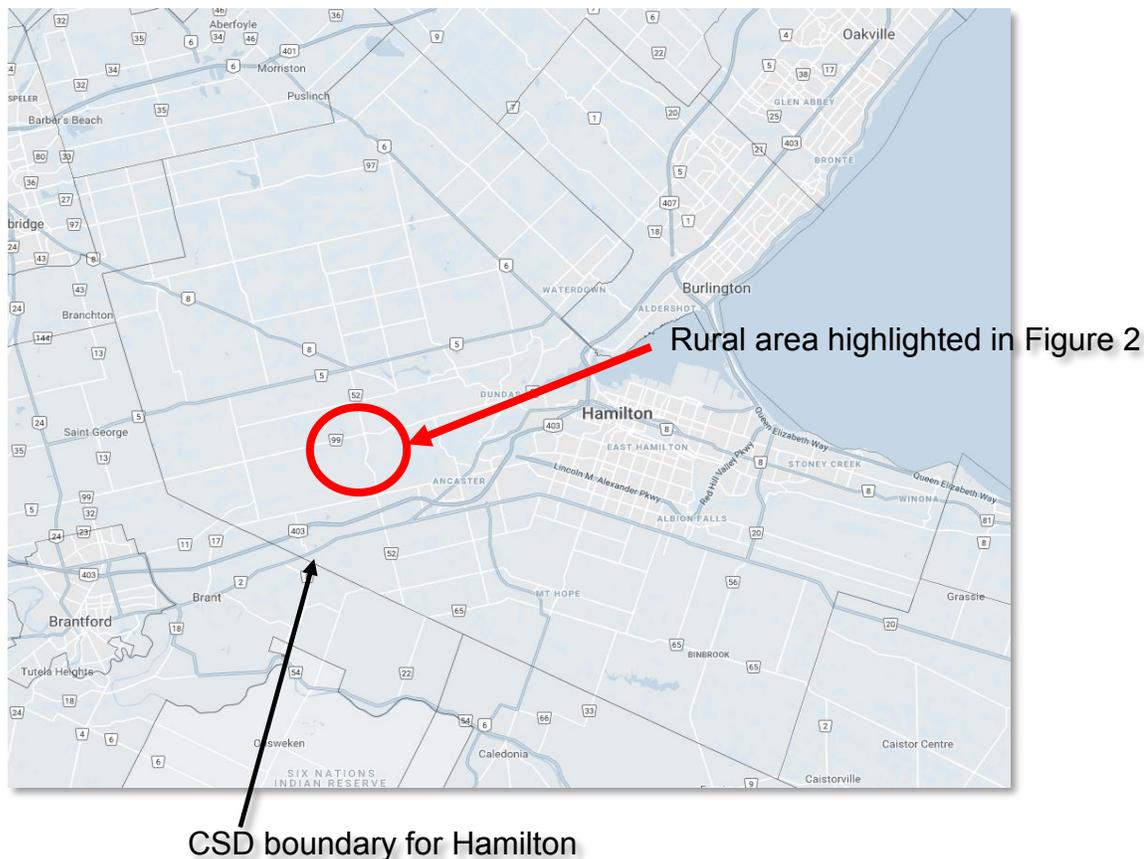
**No other proposal serves the interests of urban and rural Canadians as well as Option 2**

20. We have carefully reviewed both proposals put forward by ISED, as well as additional proposals put forward by the parties who participated in the Joint Submission<sup>2</sup> and Telus. No proposal serves the interests of urban and rural Canadians as well as Option 2. Accordingly, we maintain our view that ISED should adopt this proposal.

21. As we illustrated in our Comments, Option 1 continues to include significant rural areas within the licensing areas associated with urban centres. In Figure 3, below, reproduced from our Comments, it can be clearly observed that the rural area outside of Hamilton continues to be included as part of the licensing area associated with the urban core of Hamilton under Option 1.

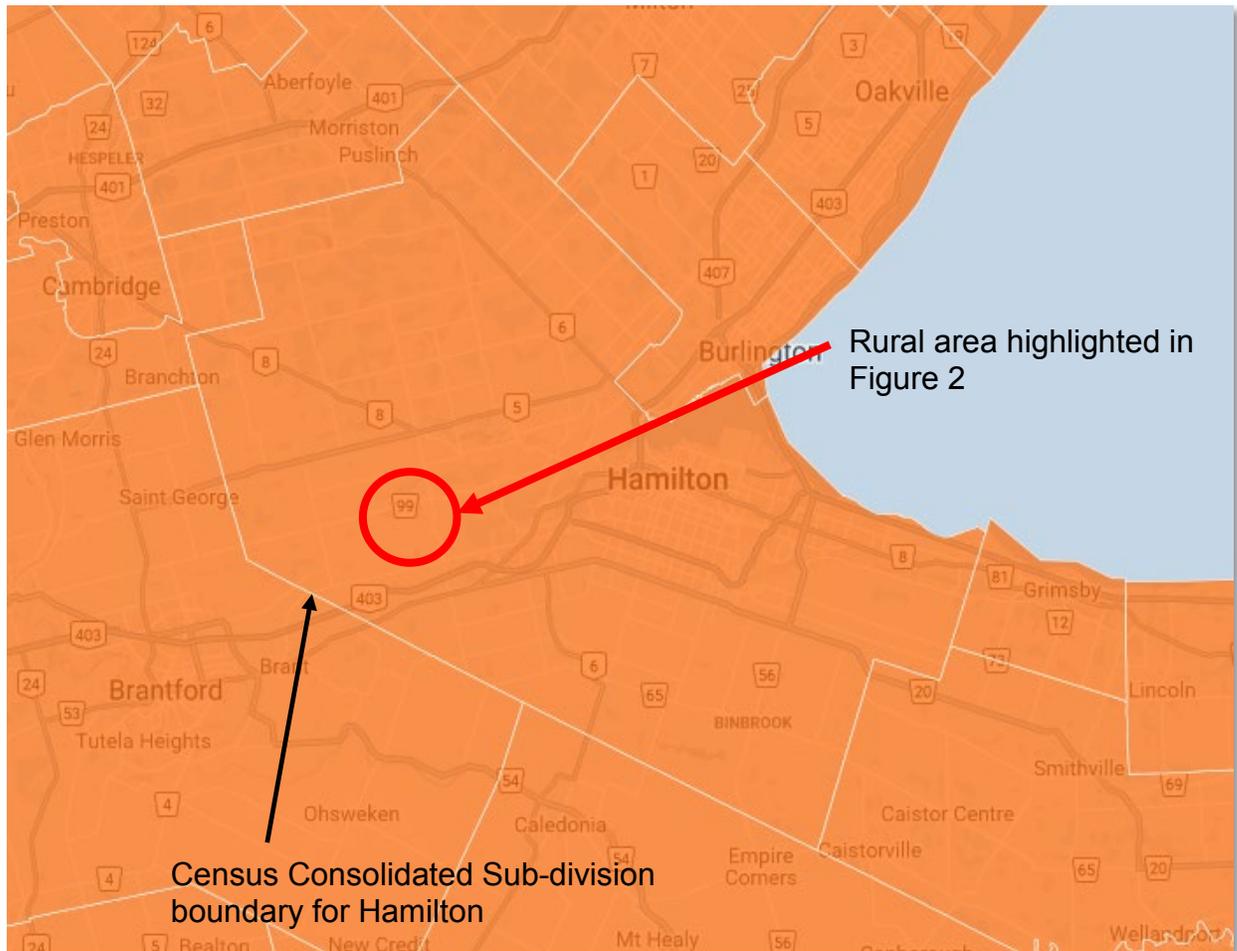
<sup>2</sup> Joint Submission filed by the British Columbia Broadband Association (“BCBA”), the Canadian Communications Systems Alliance (“CCSA”), the Independent Telecommunications Providers Association (“ITPA”), Cogeco Communications Inc (“Cogeco”), Ecotel Inc. (“Ecotel”), Sogetel Mobilité inc. (“Sogetel”) and SSI Micro Ltd. (“SSI”) (“Joint Submission”).

**Figure 3: The low-density rural area adjacent to Hamilton continues to be within the CSD boundary of downtown Hamilton under Option 1**



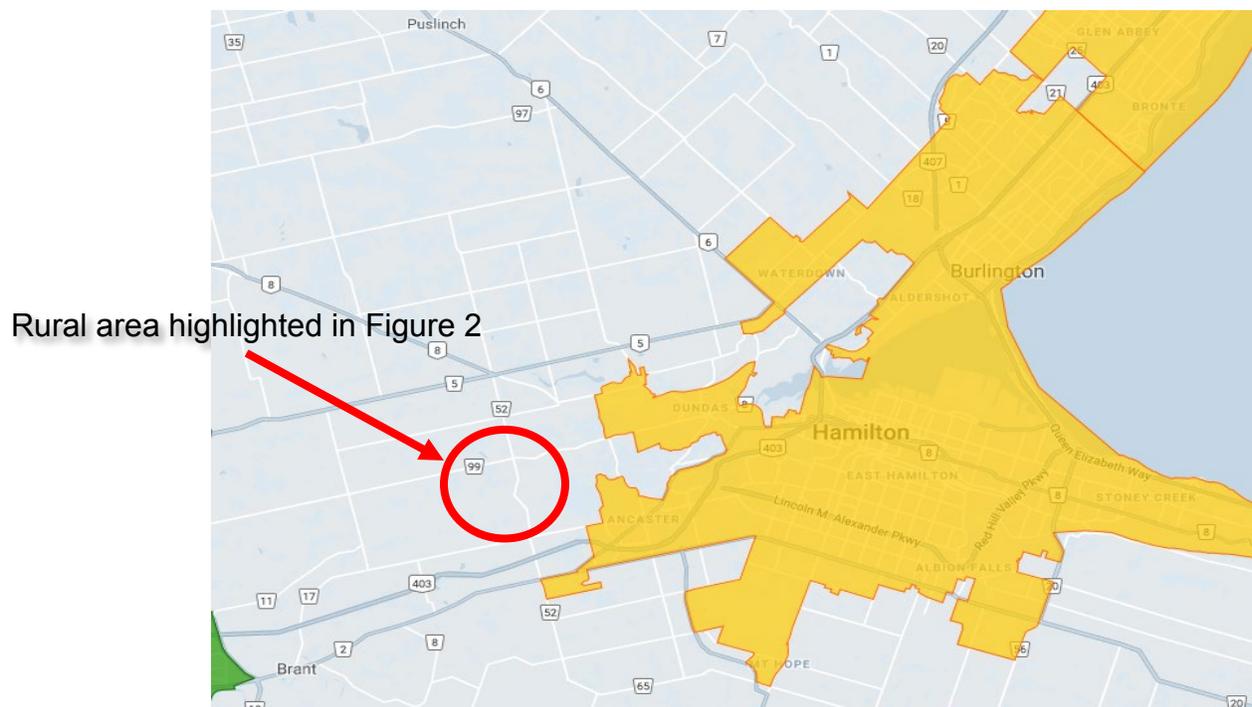
22. If Option 1 were adopted, a new set of tier 5 licence areas would fail to address the very issue that a tier 5 is seeking to resolve.
23. The same is true under the new proposal put forward by Telus. Telus has suggested that ISED could create tier 5 areas based on Census Consolidated Sub-division boundaries.
24. Drawing boundaries in the manner suggested by Telus continues to fail to address the needs of rural Canadians who live near urban centres. As can be seen in Figure 4 below, Canadians living in rural areas outside Hamilton continue to fall within the licensing area associated with the urban core.
25. Accordingly, if Telus' proposal were adopted, a new tier 5 would again fail to meet the needs of rural Canadians.

**Figure 4: The low-density rural area adjacent to Hamilton continues to be within the licence area of downtown Hamilton under Telus' proposal**



26. In contrast to the proposals above, Option 2 effectively separates urban centres from adjacent rural areas, as demonstrated in Figure 5 below (reproduced from our Comments).

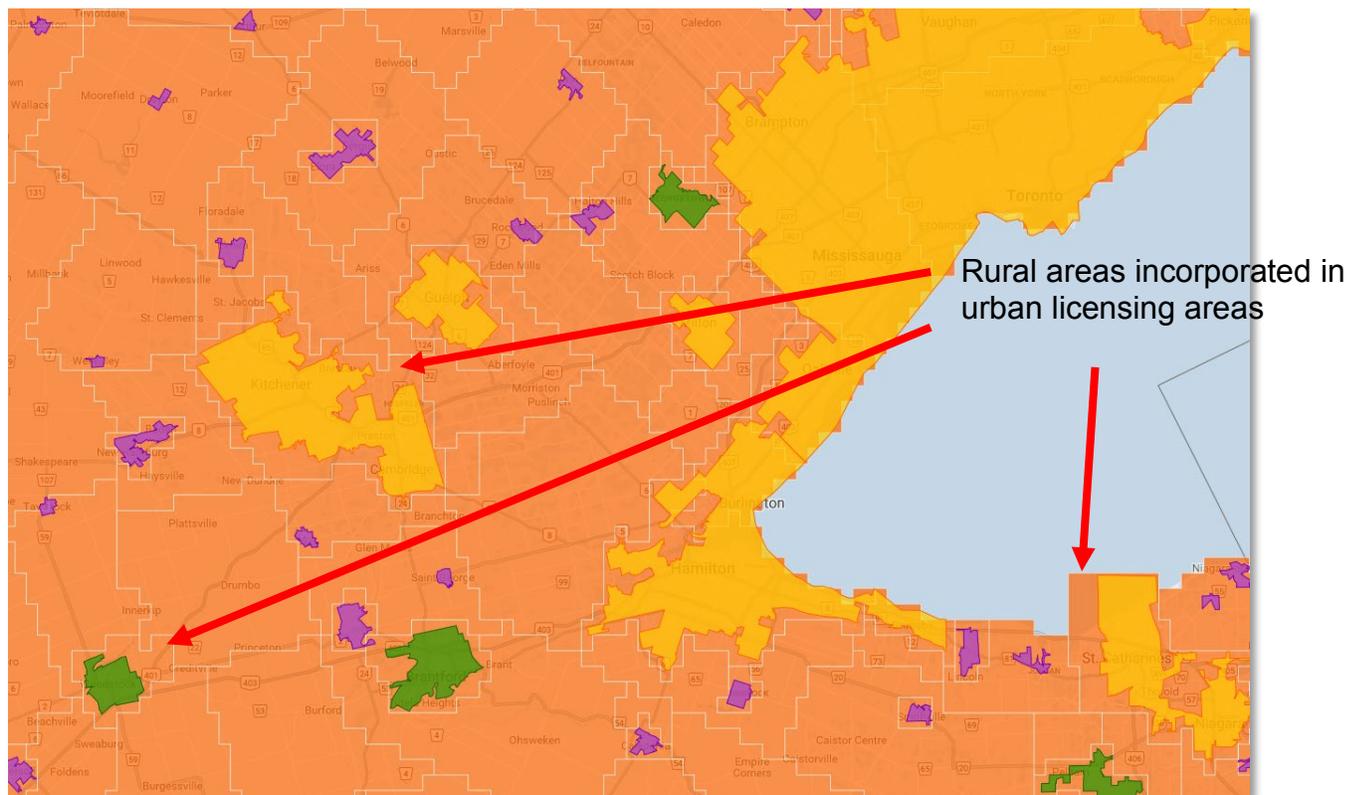
**Figure 5: Option 2 effectively separates low-population-density areas adjacent to major centres: Hamilton, ON**



27. The parties who participated in the Joint Submission put forward another proposal that in part draws upon the population centres proposed in Option 2. However, modifications made to the Option 2 population centre boundaries have reduced the ability for these boundaries to effectively meet the needs of rural Canadians.
28. Specifically, the proposal from the Joint Submission has altered the grid cells that are included within the boundaries of population centre licensing areas to expand boundary limits into surrounding low-density areas. Doing this incorporates many rural Canadians into urban centre licensing areas, replicating the problems associated with tier 4.
29. The modifications to Option 2 licensing area boundaries as proposed in the Joint Submission will have a significant impact for Canadians. As can be seen in Figure 6 below, the proposed modifications push the boundaries of population centres far beyond those proposed in Option 2.

**Figure 6: Comparison of Option 2 (yellow/green/purple) vs Joint Submission Proposal (orange):**

**Modifications to Option 2 boundaries result in many rural areas being licensed with urban centres**



30. By doing this, the Joint Submission proposal weakens ISED's Option 2, limiting the benefits that would be provided to rural Canadians living adjacent to population centres.

31. For all of these reasons, Xplornet maintains its view that Option 2 best addresses the issues associated with tier 4 licensing that a new set of tier 5 licensing areas is meant to resolve. Xplornet thus recommends that Option 2 be adopted, although with a modification, as discussed below.

**Modifying Option 2: ISED should not license small population centres as separate areas**

32. In our Comments, we proposed a modification to Option 2 that is designed to better promote the objective the SPFC. Specifically, we recommended that, instead of breaking out large population centres (population centres of over 100,000 people), medium population centres (population centres of between 30,000 and 99,999 people) and small population centres (population centres of

between 2,000 and 29,999 people), as separate licensing areas, only large and medium population centres should be separated as distinct licensing areas. This modification serves three purposes:

- 1) It promotes a tier 5 that specifically targets the problems associated with tier 4 licensing;
- 2) It promotes the effective, and efficient deployment of spectrum resources; and
- 3) It reduces administrative burden associated with tier 5 licensing.

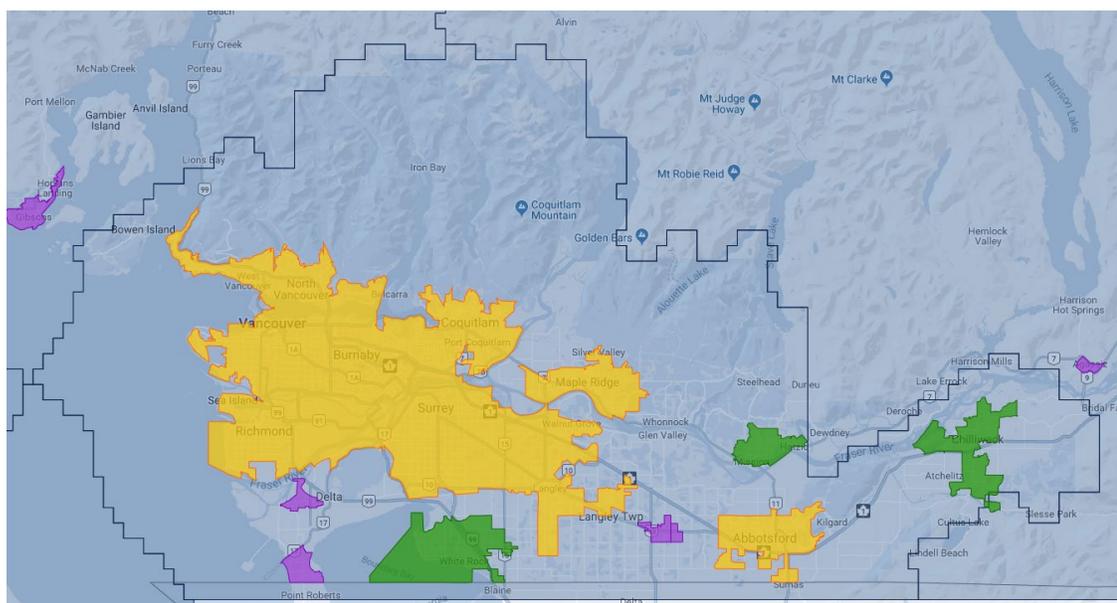
33. Xplornet maintains its recommendation that ISED should modify its proposed Option 2 to only separate large and medium population centres as separate licensing areas. It is not necessary, nor desirable, to license small population centres as distinct areas.

34. We discussed the need to license large population centres as separate licensing areas above. It is clear from our discussions concerning the large population centres of Calgary and the GTA/Hamilton area above that licensing large centres along with surrounding low-density areas prevents rural Canadians from benefitting from Canada's spectrum resources.

35. We submit that the same is true for medium population centres.

36. To provide an illustration of the importance of licensing medium population centres on a separate basis, we provide Figure 7 below. Figure 7 is an illustration of Option 2 as it would apply within the tier 4 licensing area associated with Vancouver.

**Figure 7: Option 2 within Tier 4 Licensing Area 4-152 - Vancouver**



37. As can be seen from Figure 7, it is important for medium population centres to be separated as distinct licensing areas. If the medium population centres associated with White Rock, Chilliwack and Haney were not separated as distinct licensing areas, this would place significant urban populations into the “other” area associated with the Vancouver tier 4 licensing area. Licensing these significant population centres with the surrounding low-density areas would perpetuate the same dynamics associated with today’s tier 4 licensing, whereby large providers would bid for the “other” area in order to serve these high-density populations, while leaving the surrounding rural Canadians unserved. Licensing only large population centres as separate licensing areas would thus continue to prevent rural Canadians from benefitting from Canada’s spectrum resources. It is entirely appropriate – and necessary – to separate medium population centres as distinct licensing areas.
38. This is not the case with small population centres. Indeed, Xplornet submits that it is not necessary to license small population centres as distinct licensing areas. We do not believe that any regional or rural providers are making a business case on only serving the surrounding areas outside of small population centres. Furthermore, we do not believe that smaller providers would be unable to compete in spectrum auction scenarios to bid for “other” areas that contained small population centres.
39. Indeed, there is a large degree of consensus amongst parties – large and small providers included – that it is unnecessary to break out small population centres as small as 2,000 residents as separate licensing areas. The providers who participated in the Joint Submission<sup>3</sup>, Rogers<sup>4</sup> and TekSavvy<sup>5</sup>, have each argued that the Commission should not license small population centres as small as 2,000 on a separate basis.
40. Furthermore, certain parties<sup>6</sup> that have criticized Option 2 have done so on the basis that the remaining “other” areas provide insufficient value to foster demand in accordance with ISED’s design principles. Incorporating small population centres into the “other” territory addresses this concern by increasing the population of the “other” area, fostering demand to serve this remaining area.
41. Licensing only large and medium population centres as separate licensing areas also better promotes the objective of the SPFC. A tier 5 design that promotes the contiguous deployment of spectrum by not creating unnecessary divisions of tier 4 licence areas enables providers to effectively leverage spectrum resources to maximize the utility of spectrum resources for Canadians. By limiting the number of licensing areas that are created through the introduction of a new tier 5 to only those that are necessary to address the problems associated with tier 4 licensing, ISED can limit the risk that its licensing framework will result in

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<sup>3</sup> Joint Submission, paragraph 77.

<sup>4</sup> Rogers, paragraphs 68-69.

<sup>5</sup> TekSavvy, paragraph 40.

<sup>6</sup> See, for example, Canadian Electrical Association, paragraph 3; EOWC/EORN, paragraph 32; Joint Submission, paragraph 77; MRC de Témiscouata, paragraph 25.

inefficient, patchwork network deployments and best ensure that Canadians obtain maximum benefits from spectrum resources.

42. By reducing the number of spectrum areas that must be licensed, ISED will equally reduce the administrative burden associated with its spectrum management practices, as required by the Enabling Guidelines of the SPFC. SPFC, Enabling Guideline (f) specifically states that:

“Spectrum management practice, including licensing methods, should minimize administrative burden and be responsive to changing technology and market place demands.”

43. Accordingly, we maintain our recommendation that ISED adopt Option 2, as modified to only license large and medium population centres on a separate basis. This proposal best addresses the licensing problems associated with tier 4 licence areas in a targeted, effective manner, while minimizing new administrative burden and minimizing potential impacts on the efficient, contiguous deployment of spectrum needed to ensure Canadians receive maximum benefits from spectrum resources.

#### **OTHER CRITICISMS OF OPTION 2 SHOULD BE DISMISSED**

44. Further criticisms that parties have raised with respect to Option 2 are not credible and should be dismissed by ISED. The principal arguments that parties have raised against Option 2 are as follows:

- 1) Apart from separating rural and urban well, Option 2 remains similar to tier 4 licensing areas;<sup>7</sup>
- 2) It is more difficult to manage interference around the more irregular shapes associated with population centre boundaries;<sup>8</sup>
- 3) Population centres can be split across tier 4 boundaries;<sup>9</sup>
- 4) Population shifts/growth/decline may require revisions to population centre boundaries in the future;<sup>10</sup> and
- 5) “Other” areas do not sufficiently isolate industrial centres.<sup>11</sup>

45. None of these considerations favours the adoption of a tier 5 proposal other than Option 2.

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<sup>7</sup> EWOC/EORN, paragraph 32; Joint Submission, paragraph 72; MRC de Témiscouata, paragraph 25.

<sup>8</sup> Joint Submission, paragraph 70; Rogers, paragraph 43; TekSavvy, paragraph 33 to 35.

<sup>9</sup> Joint Submission, paragraph 66; Shaw, paragraph 27; TekSavvy, paragraph 36.

<sup>10</sup> Joint Submission, paragraph 74; Radio Advisory Board of Canada, paragraph 21; Rogers, paragraph 38.

<sup>11</sup> Imperial Oil; Suncor Energy Services Inc.; Syncrude Canada Ltd.; Teck Resources Ltd..

**The goal of creating a new tier 5 is not to divide the country into smaller areas, but to ensure spectrum better serves the needs of both rural and urban Canadians**

46. As noted above, the goal of creating a new set of tier 5 licensing areas is not to divide the country into smaller licensing areas; it is to create licensing areas that better distinguish between rural and urban areas of the country to ensure that spectrum resources are deployed in a manner that best meets the unique needs of rural and urban Canadians.
47. As we have demonstrated above, Option 2, with our recommended modification, best serves the needs of Canadians by effectively separating large and medium population centres from rural parts of the country. By adopting this proposal, ISED will effectively address the characteristics of tier 4 licensing that have prevented rural Canadians from benefiting from Canada's spectrum resources. No other proposal similarly achieves this goal.
48. In adopting Option 2, Xplornet does not believe that it is necessary to create further divisions of tier 4 service areas, as certain parties have proposed, such as those who participated in the Joint Submission. As we discussed above, creating further divisions of "other" areas will unnecessarily increase the risk of fragmented network deployments, limiting the ability of providers to deploy spectrum in a contiguous manner and reducing the benefits that can be leveraged from spectrum resources for Canadians.
49. Furthermore, in addition to reducing the benefits to Canadians, creating additional licence areas will introduce significant, unwarranted administrative burden for service providers and for ISED, contrary to the Enabling Guidelines of the SPFC. Option 2, modified as we propose, would only introduce 88 additional licensing areas beyond those that exist for tier 4 licensing today. This is a proportionate and reasonable solution that effectively addresses the problems associated with tier 4 licensing while limiting the imposition of new administrative burden on parties. In contrast, if the proposal set out in the Joint Submission were adopted, 1126 additional licensing areas would be created beyond the number of tier 4 licence areas that exist today. Such an outcome would introduce an entirely disproportionate level of administrative complexity into ISED's spectrum management practices that is not necessary to address the needs of rural Canadians.
50. Accordingly, Xplornet does not view the fact that the design of a new set of tier 5 service areas may share characteristics of today's tier 4 licence areas as a problem that needs to be addressed. The purpose of this proceeding is to address the failure of tier 4 licensing to meet the needs of both rural and urban Canadians. Option 2, as modified, does this in a very effective and proportionate manner.

**Interference considerations are minimized under a modified Option 2 and are entirely surmountable**

51. Parties have made arguments that the shapes associated with population centre boundaries would make it difficult to manage interference between providers.
52. Service providers are highly skilled at deploying and managing their networks to address interference. Interference considerations are a routine part of operating a wireless network and service providers are fully capable of coordinating network deployments to navigate the boundaries of population centres.
53. Xplornet submits that the modification that it has proposed to Option 2, through which only large and medium population centres would be licensed as separate areas, would dramatically reduce the degree of coordination that service providers would need to engage in in deploying their respective networks.
54. As proposed in the Consultation, Option 2 would create 30 large population centres, 58 medium population centres and 563 small population centres. By not licensing the 563 small population centres as separate areas, this would significantly reduce network coordination concerns between providers.
55. As discussed above, Xplornet submits that the level of complexity associated with introducing 88 new licensing areas beyond those that exist in tier 4 licensing today is fully proportionate and justified. This is the least amount of regulatory intervention that is required to effectively address the failure of tier 4 licensing to meet the needs of rural and urban Canadians. A modified Option 2 would best serve Canadians while minimizing any additional complexity imposed on service providers.

**ISED should be flexible with the principle that tier 5 service areas should nest within existing tier 4 area boundaries**

56. Xplornet agrees that there are situations where population centres straddle tier 4 boundaries. This makes it impossible for ISED to maximize the achievement of both the design principles to: 1) recognize geographic differences by considering the unique characteristics of urban and rural areas in Canada; and 2) ensure areas nest within the existing tier 4 service areas to maintain continuity with ISED's existing licensing structure.
57. As discussed above, the entire purpose of creating a new set of tier 5 service areas is to address the failure of tier 4 licensing to meet the needs of both rural and urban Canadians. Accordingly, Xplornet submits that this design principle should have precedence and ISED should allow population centres not to nest within tier 4 service areas where a population centre straddles a boundary.

58. Providing flexibility with respect to tier 4 nesting would allow Option 2 to be implemented in an effective manner.

**Tier 5 area boundaries may be reviewed in the future to ensure the needs of Canadians continue to be met**

59. Certain parties have argued that population centre boundaries may change over time through population growth, shift and decline. As stated by the parties who participated in the Joint Submission:

“In addition, BCBA, Canwisp, CCSA, ITPA, Cogeco, Ecotel, Sogetel and SSi are concerned that the urban areas which form the basis of Statistics Canada’s population centres change over time. As a result the boundaries of the population centre can shift as populations grow and shift, and **Tier 5 service areas based on 2016 census population centres might no longer be appropriate in 10 or 20 years’ time**, if the objective is to separate urban from rural areas.”<sup>12</sup> [Emphasis added]

60. Consistent with the views of the parties who participated in the Joint Submission, Xplornet submits that it may be appropriate for ISED to undertake a review of tier 5 service boundaries in 10 or 20 years’ time to ensure that population centre boundaries continue to best serve the needs of Canadians.

61. ISED should not attempt to foresee future population shifts, growth or decline and modify population centre boundaries on a prospective basis at this point in time. Doing so would not serve the needs of Canadians today. The population centre boundaries proposed in Option 2 best separate urban and rural Canadians into distinct licensing areas to ensure that spectrum resources can be leveraged to meet their unique and current needs.

**Tier 5 boundaries do not need to specifically consider industrial sites in order for industrial sites to be well served**

62. Finally, we note that a number of resource extraction companies have filed comments in the present proceeding to voice concerns that a new set of tier 5 service areas based on Option 2 does not sufficiently isolate industrial sites to allow for the implementation of wireless technologies in their businesses.

63. Xplornet submits that it would be inappropriate for service areas to be created that isolate industrial sites. We agree with the view put forward by Rogers that services to meet the needs of industrial sites can be easily provided through customized solutions negotiated with service providers.<sup>13</sup> Considerations related to industrial sites should not guide the design of licensing areas.

**CONCLUSION**

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<sup>12</sup> Joint Submission, paragraph 74.

<sup>13</sup> Rogers, paragraph 12.

64. A new set of tier 5 service areas is needed to ensure spectrum is licensed in a manner that allows it to be effectively leveraged to meet the unique needs of both rural and urban Canadians. By covering both rural and urban areas within the same tier 4 licensing areas, tier 4 licensing has prevented rural Canadians from benefitting from Canada's spectrum resources, as spectrum licensing and deployments have been driven by the needs of urban Canadians. In creating a new set of tier 5 licence areas, ISED has the opportunity to create licence areas that separate urban and rural regions to ensure spectrum resources are best leveraged to meet their unique needs.
65. Having reviewed the comments put forward by parties in this proceeding, Xplornet maintains its view that ISED should adopt Option 2 in creating a new set of tier 5 service areas. We further maintain our recommendation that Option 2 should be modified to only license large and medium population centres as separate licensing areas.
66. A modified Option 2 represents the least amount of regulatory intervention that is required to effectively address the failure of tier 4 licensing to meet the needs of rural and urban Canadians. A modified Option 2 would best serve Canadians while minimizing any additional complexity imposed on service providers.
67. We thank ISED for the opportunity to provide these comments.

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