



TELUS COMMUNICATIONS COMPANY

Comments for

Consultation on a Licensing Framework for Residual Spectrum Licences in the 700 MHz and AWS-3 Bands

SLPB-002-15

May 2015

Spectrum Management and Telecommunications

May 25, 2015

1. TELUS appreciates the opportunity to provide its comments.
2. TELUS generally supports the Department's proposed approach with some suggested recommendations for modification to ensure that the benefits of competition, investment and innovation are delivered to Canadians in Saskatchewan, Manitoba and the North, in a timely fashion.
3. TELUS supports the proposed Licensing Framework with the following exceptions.

Remove 700 MHz Spectrum Caps in North

- TELUS opposes maintaining the spectrum caps on the 700 MHz spectrum in the northern licences. TELUS recommends that the same treatment be afforded the unsold northern 700 MHz spectrum as the unsold AWS-3 spectrum. The competitive measure in the northern licences in the 700 MHz auction in 2014 did not result in the licensing of the spectrum and now it should go to the highest bidder just as the Department proposes that the residual AWS-3 spectrum be licensed.
- TELUS notes that in the very recently concluded BRS auction, the Department applied an exception to the northern licences. The northern BRS licences were the only uncapped licences in the BRS auction.
- In each of the last three auctions, spectrum went unsold in the northern licence areas leaving 60 MHz unassigned in every northern licence area – 10 MHz of 700 MHz band, 30 MHz of AWS-3 and 20 MHz of BRS. TELUS believes that this is clear evidence of a lack of need to maintain the spectrum caps on the 700 MHz spectrum in the northern licences and therefore TELUS opposes maintaining the spectrum caps.

Maintain Timelines to Reach AWS-3 Deployment Levels in Saskatchewan and Manitoba

- TELUS opposes the proposed reduction to the timelines to reach the deployment levels in Saskatchewan and Manitoba. While supportive of stringent deployment requirements, TELUS considers maintenance of the eight year timeline appropriate in this case due to the fact that the definition of the AWS-3 band in

the 3GPP specifications is incomplete. Once technical specifications for network equipment and devices are settled and then the product development cycle completed, the US carriers will still need to progress through a transition with AWS-3 incumbents.

- A three year reduction in the time to deploy spectrum being auctioned less than 6 months after the original auction would also unnecessarily complicate the management of licensing by any licensee who ended up with holdings of the 8 year variety and the 5 year variety.

End of document