



INUIT

October 26, 2020

Chantal Davis, Director
Spectrum Regulatory and Best Practices
Spectrum Licensing Policy Branch
Innovation, Science and Economic Development Canada
235 Queen Street (6th Floor, East Tower)
Ottawa ON K1A 0H5
Submitted via email ic.spectrumauctions-encheresduspectre.ic@canada.ca

Dear Ms. Davis,

RE: Canada Gazette, Part I, Volume 154, Number 37: GOVERNMENT NOTICES, September 12, 2020, INNOVATION, SCIENCE AND ECONOMIC DEVELOPMENT CANADA RADIOCOMMUNICATION ACT, Notice No. SLPB-002-20 — Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band

1. The following comments are submitted in response to select questions and issues raised in the above-referenced consultations on the technical and policy framework for spectrum management, with changes impacting connectivity and economic opportunities for Inuit living across the circumpolar Arctic.
2. Thank you, in advance, to the officials at Innovation, Science and Economic Development Canada (ISED), for leading these consultations on behalf of the Minister. Inuit help Canada play a leadership role in the global satellite, space and communications industries, from local knowledge, the earliest research expeditions to the next generation systems ready for deployment today and tomorrow. An enhanced Inuit focus moving forward will provide continuity for Canada's innovative spectrum sharing policy framework.
3. In the consultation document, ISED notes that the propagation characteristics and existing infrastructure for fixed satellite services (FSS) in 3700-4200 MHz have made the band important for providing telecommunications, media and Internet to remote and northern communities (para. 69). ISED cites trends in the global satellite industry (para. 64), "harmonization of FSS use in Canada and the United States" (para. 61) as well as recent decisions by the Federal Communications Commission (FCC) on allocations within the band for flexible use in auction and for repack purposes, including but not limited to Alaska (para. 70).

Remote Priority Window for Direct Access to Spectrum

4. The FCC Rural Tribal Priority Window (December 2019) is a comparative U.S. initiative that may be of note for ISED in current consultations (fcc.gov/RuralTribalWindow). The intent is to provide direct free spectrum allocations to indigenous communities for use and control over their lands, including Inuit in Alaska. We support further consultations by ISED on the applicability and viability of a similar program for Inuit communities in Canada, including in the C-Band and new FSS earth stations. With an extensive outreach program like the FCC approach, this type of innovative initiative will help address the connectivity needs and close the digital divide for Canadians in remote communities, enhancing local control, ownership, administration, and operations.

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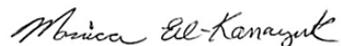
INUIT CIRCUMPOLAR COUNCIL (CANADA)

Broadcast Internet and Advanced Television Systems

5. An additional comparative consideration by ISED for the current consultations may include the June 19, 2020, FCC declaratory ruling to promote local broadcast internet services, including deployment of available internet protocol next-generation advanced television systems with multicast ATSC 1.0 and 3.0 transmitters. Broadband wireless services in satellite dependent areas, like remote communities across the circumpolar Arctic, may benefit directly from local control and management of flexible use spectrum for real-time fast connectivity, enhanced data capacity, television, education, health and emergency alert systems. As the U.S. comparative example supports, the case studies go beyond private wireless providers and 5G networks.
6. Further consideration may include costs of equipment, operations and testing, not only for existing service providers but also for those local Inuit communities dependent on satellite services for broadband connectivity, Internet access and telephony (para. 92).
7. Making spectrum available first to Inuit communities, then auction the remaining to facilitate the continued deployment, is a reasonable beginning premise to close existing data and infrastructure deficits, finally. Further North of 60 cross-border analysis is likely to support the need for coexistence measures on Canada's data infrastructure networks between the U.S. and E.U. systems. The circumpolar Arctic is the beginning point for continued consultations (Q3).

Thank you for receiving these comments, and we welcome continued discussions on these important measures that directly impact the quality of life for Inuit in remote Canadian Arctic communities.

Sincerely,



Monica Eil-Kanayuk
President