

July 12, 2018

VIA Email: ic.spectrumauctions-encheresduspectre.ic@canada.ca

Innovation, Science and Economic Development Canada
c/o Senior Director, Spectrum Licensing and Auction Operations
235 Queen Street, 6th Floor
Ottawa, Ontario
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Subject: **Canada Gazette Notice No. SLPB-004-18 - Consultation on Revisions to the 3500 MHz Band to Accommodate Flexible Use and Preliminary Consultation on Changes to the 3800 MHz Band**

1. Pursuant to the procedures established in *Consultation on Revisions to the 3500 MHz Band to Accommodate Flexible Use and Preliminary Consultation on Changes to the 3800 MHz Band*, Canada Gazette Notice No. SLPB-004-18 (“the consultation document”) the Canadian Communication Systems Alliance, Inc. (“CCSA”) hereby submits its comments.
2. The Canadian Communication Systems Alliance (“CCSA”) speaks for independent communications distributors – smaller broadcasting distribution companies, telephone companies and ISPs – across Canada. CCSA represents more than 110 companies operating from sea to sea to sea, including across the North.
3. CCSA members serve more than 1,200 communities throughout Canada, including some of the country’s lowest population-density and most geographically challenging areas. Many of those members use fixed wireless as a means to cost-effectively extend the reach of their networks.
4. CCSA has had the opportunity to review, in draft, the comments of CanWISP in response to this consultation. Many of CanWISP’s members are also members of CCSA.
5. CCSA supports and endorses CanWISP’s analysis and recommendations.

6. Like CanWISP, CCSA strongly supports a flexible licensing approach that enables service providers to dual use of spectrum for 4G and 5G applications in the 3.5GHz and 3.8GHz bands according to their needs and that maximizes effective, efficient use of this valuable spectrum.
7. Economic access to spectrum, generally, is a huge issue for the smaller, mostly rural communications companies that CCSA represents. In its October 2, 2017 response to the Department's Consultation on a Technical, Policy and Licensing Framework for spectrum in the 600 MHz Band (SLPB-005-17), CCSA said:
 21. CCSA endorses the BCBA's recommendation that government should consider very seriously how spectrum might be made more readily available to smaller, independent ISPs, be deployed to accelerate achievement of the objectives of a national broadband strategy and contribute to reducing the costs of implementing that strategy.
 22. CCSA emphasizes that its recommendation has two elements:
 - as ITPA recommends, recognition, in spectrum auction design, of the need for "smaller service areas than even Tier 4 areas" such that affordable blocks of spectrum are available to smaller operators; and
 - as BCBA recommends, encouragement of spectrum licence holders to "sub-divide and sublicense their spectrum holdings in rural and remote areas".
8. CCSA supports, licensing of spectrum for smaller geographic areas and, in particular, mechanisms that encourage the larger spectrum holders to sub-licence spectrum and that discourage their hoarding of this important spectrum.
9. CCSA members have also discussed among themselves the potential benefits of a "Spectrum as a Service" model as an alternative to existing auction processes that, today, pose unsurmountable administrative and cost barriers to most smaller communications distributors. CCSA endorses the SAS model.
10. Finally, CCSA supports CanWISP/Nordicity's recommendations regarding both extension of protection periods for existing fixed wireless uses and reduction of the geographic buffer areas around major urban centres. CCSA members' experience confirms with CanWISP's observation that there are many households within 10 km of many of large urban population centres that do not have access to reliable high-speed broadband services through fiber, cable, or ADSL, infrastructure.



11. CCSA thanks the department for the opportunity to make these comments.

Sincerely,

A handwritten signature in black ink that reads "C. J. Edwards". The signature is fluid and cursive, with the first name and last name clearly legible.

Christopher J. Edwards
Vice-President, Regulatory Affairs

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