

SaskTel Reply Comments:

Gazette Notice SLPB-006-18

Consultation on a Licence Renewal
Process for Spectrum in the Bands
849-851 MHz and 894-896 MHz for
Air-Ground Services

October 10, 2018

INTRODUCTION

1. Saskatchewan Telecommunications (“SaskTel” or “the Company”) is pleased to provide these reply comments in response to the submissions posted¹ regarding Gazette Notice SLPB-006-18 *Consultation on a Licence Renewal Process for Spectrum in the Bands 849-851 MHz and 894-896 MHz for Air-Ground Services* (“the Consultation”). Comments were submitted by Gogo Inc., Rogers Communications Canada Inc. and Skysurf Canada Communications Inc., as well as by SaskTel.
2. SaskTel’s reply comments are below. The section numbering of this document corresponds to the section numbering of the Consultation. Failure to address any particular issue or item, or the Comments made by any other party, should not be construed as agreement with those Comments where such agreement is not in the interests of SaskTel.

SASKTEL’S REPLY COMMENTS IN RESPONSE TO THE CONSULTATION ON A LICENCE RENEWAL PROCESS FOR SPECTRUM IN THE BANDS 849-851 MHZ AND 894-896 MHZ FOR AIR-GROUND SERVICES

3. SaskTel has reviewed the comments submitted by the other respondents to the Consultation.
4. We note the investment of “close to \$1 billion” by Gogo to provide airborne broadband service². It is not clear however how much of this investment has been made in Canada to serve the Canadian market.
5. While SaskTel agrees that a substantial investment has been made to provide the current air to ground broadband service, SaskTel notes that the telecommunications industry as a whole is growing and evolving, and the air-ground broadband segment is no exception.

¹ ISED website <http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf11434.html>

² Gogo comments, paragraph 10

6. As the Department is well aware, consumers are demanding higher bandwidth broadband services, with lower latencies to support new and evolving applications. Wireless service providers such as SaskTel are meeting this demand by utilizing additional spectrum at higher frequencies that can support the provision of larger bandwidths to the consumer.
7. SaskTel continues to question the long-term viability of continuing to use the limited 849-851 MHz and 894-896 MHz spectrum bands to provide air to ground broadband services in the future, particularly in meeting the growing consumer expectations of higher bandwidths.
8. Also, as noted by the Department in the Consultation³, technological advances are making satellite solutions more viable. There are several large-scale low earth orbit (LEO) satellite constellations being developed now that will soon be launched. These LEO satellite networks are promising to deliver high bandwidth bandwidths to consumers globally. The global coverage of the proposed LEO satellites makes them well suited to provide service to the aviation industry.
9. Therefore, because of the inherent limitations of the 849-851 and 894-896 MHz spectrum to provide high bandwidth services, and the impending introduction of high bandwidth LEO satellite technologies capable of providing service globally, it is important that the Department closely monitors the utilization of this band to ensure that this spectrum continues to be used effectively and efficiently for the benefit of all Canadians. SaskTel therefore agrees with the proposed annual reporting requirements as outlined in the Consultation.⁴
10. The Department must also retain full flexibility in the licensing of this band, which will allow the Department to effectively respond to future developments in this spectrum. Therefore, SaskTel agrees with the proposal by the Department that licences issued through this renewal process not be given a high expectation of renewal.

³ The Consultation, paragraph 17

⁴ Ibid., section 6.3, paragraphs 25 and 26

11. As stated in SaskTel's comments, it is essential that Canadian spectrum allocations and licensing for spectrum in the 849-851 MHz and 894-896 MHz bands be aligned and harmonized with the FCC in the United States, both currently and into the future. SaskTel recommends that licence terms for renewed licences in the 849-851 MHz and 894-896 MHz bands in Canada be determined such that the Canadian licence expiry dates align with the October 2026 licence expiry dates for corresponding licences in the United States.
12. Because of the evolving nature of the industry, it is imperative that the Department conducts a review of this spectrum in the near future to ensure the spectrum is being used effectively and efficiently for the benefit of all Canadians. As stated by Rogers in their comments,⁵ a holistic view of spectrum management is required. SaskTel agrees with Rogers that a review of the 849-851 MHz and 894-896 MHz bands should be combined with a planned review of the adjacent 806-824 / 851-869 MHz and 824-849 / 869-894 MHz spectrum bands. This review was discussed by the Department in the Spectrum Outlook⁶. By reviewing all of the bands together, the most effective use for this spectrum can be realized.

CONCLUSION

13. SaskTel is pleased to have had the opportunity to provide our reply comments on the important issues raised in this Consultation regarding the renewal of spectrum licences in the 849-851 MHz and 894-896 MHz bands for air-ground services. It is our hope that our submission will provide a fuller view of these issues to the Department.

⁵ Rogers comments, paragraphs E2, and 5

⁶ Spectrum Outlook 2018 to 2022, section 8.1.2, <http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf11403.html>