

April 6, 2011

Manager, Mobile Technology and Services,
DGEPS, Industry Canada,
300 Slater Street, Ottawa,
Ontario K1A 0C8.

Subject: Reply to Comments from other parties to Notice No. SMSE-018-10 –
*Consultation on a Policy and Technical Framework for the 700 MHz Band and Aspects
Related to Commercial Mobile Spectrum (December 4, 2010)*

Dear Sir,

- 1 Pursuant to the procedure released in Gazette Notice No. SMSE-009-11 dated March 26, 2011; interested parties were given the opportunity to reply to comments from other parties. Below are the replies to comments from the BC Broadband Association (“BCBA”).
- 2 BCBA notes that the national wireless providers all supported very large license areas (Tier-1 and Tier-2). Small rural service providers would be very challenged to raise sufficient funds to win spectrum in a large region. The BCBA supports Tier-4 service areas for enhancing broadband services in rural areas.
- 3 The BCBA supports the TELUS position that the 2500 MHz auction should precede the 700 MHz auction. Bell and Rogers hold a significant advantage in this spectrum band in British Columbia. Our members need to be able to migrate their networks from the unlicensed 2.4 GHz band to a licensed band that has similar propagation characteristics.

- 4 TELUS, Rogers and Bell expressed no support for a spectrum set-aside. While the BCBA supports no spectrum set-aside in dense urban areas, our members do support a set-aside mechanism, as described in the BCBA submission, over spectrum caps. Spectrum caps are of limited benefit to small enterprises, and would not provide our members with a viable opportunity to obtain spectrum. Currently, incumbent operators hold the majority of fixed wireless access spectrum in the 2.5 and 3.5 GHz band. Our members have demonstrated their ability to deploy in these bands more effectively than the incumbents, despite limited access to spectrum.
- 5 The BCBA agrees with Globalive's comments regarding mandated roaming and supports the concept of a ten-year mandated roaming period.
- 6 The BCBA would like to thank Industry Canada for giving our group an opportunity to present our perspective on these issues.

Sincerely yours,



Bob Allen
President
BC Broadband Association

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