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September 13, 2019

TerreStar Solutions Inc.
300 – 1035 Laurier Avenue West
Montreal, Quebec
H2V 2L1

Martin Proulx
Director General Engineering Planning and Standards Branch
Spectrum and Telecommunications Sector (STS)
Innovation, Science and Economic Development Canada
235 Queen Street
Ottawa ON K1A 0C1

TerreStar Solutions Inc. Response to the August 8th, 2019 Notice of Application Received from Globalstar Canada Satellite Co. for Ancillary Terrestrial Component (ATC) Authority in the 2.4 GHz Band (2483.5-2500 MHz).

Dear Mr. Proulx,

TerreStar Solutions Inc. (“TerreStar”) is pleased to submit its comments in relation to issues raised in *Notice of Application Received from Globalstar Canada Satellite Co. for Ancillary Terrestrial Component (ATC) Authority in the 2.4 GHz Band (2483.5-2500 MHz)* dated August 8th, 2019.

TerreStar is a deeply experienced Canadian company which has purchased the necessary satellite and ground stations to acquire licences for a geostationary satellite in a Canadian orbital slot and is licensed as the sole 2 GHz Mobile-satellite service (“MSS”) operator in Canada to offer MSS and Ancillary Terrestrial Component wireless services in the AWS-4 frequency band. Its partners include DISH Networks (“DISH”) and Fortress Investment Group.

ISED indicates in this Notice that satellite communication continues to be an important component of the Canadian telecommunications infrastructure, contributing to communication and safety services in many dispersed and remote communities and areas in Canada. As an MSS service provider, TerreStar supports this position and supports Globalstar’s commitment to continue to provide MSS services in Canada as they pursue their ATC aspirations.

The current version of RP-023 requires the implementation of dual-mode user equipment. In recognition of the evolution of ATC technology, ISED removed this requirement for TerreStar in the December 2014 - 2 GHz *Decision on a Policy, Technical and Licensing Framework for Mobile Satellite Service and Advanced Wireless Service (AWS-4) in the Bands 2000-2020 MHz and 2180-2200 MHz*. TerreStar supports ISED's removal of the dual-mode requirement for Globalstar Canada in the 2483.5-2500 MHz band.

Globalstar Canada has plans to implement their ATC system in small cell configuration in its MSS downlink spectrum (2483.5 – 2500 MHz). ISED submits that this mode of operation must use the same technical rules for the band as in the U.S. TerreStar supports this approach.

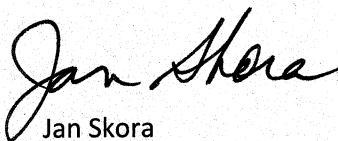
TerreStar agrees with ISED's action of considering this application in advance of a more comprehensive review of RP-023 given the limited changes being requested by Globalstar Canada and the opportunity to provide additional services.

ISED is proposing site-specific radio station licences for Globalstar as an interim measure. The applicable licence fees for each site licence will be based on section 72, Fixed Station Communicating with a Station not Otherwise Described, as set out in schedule III, Part III, item 1, of the Radiocommunication Regulations. This licence renewal fee is set at \$41 per receive or transmit frequency.

This fee is considerably lower than the fee TerreStar is currently being charged per site-specific radio station. TerreStar's fee is set under Radiocommunication Regulations Schedule III, Part V, item 1(a) as \$232 per channel (\$116 per transmit/receive frequency) in metropolitan areas and \$ 106 per channel (\$53 per transmit/receive frequency) in the non-metropolitan areas.

To ensure equity between similar ATC services provided by different service providers, TerreStar requests ISED set a common interim fee for all ATC site-specific radio stations.

Sincerely yours,

A handwritten signature in black ink that reads "Jan Skora".

Jan Skora
Vice President Regulatory Affairs
TerreStar Solutions Inc.