1. Comments are invited on the proposed changes to the Canadian Table of Frequency Allocations with regards to the footnotes in the band 2500-2690 MHz.

RESPONSE:
International footnote 5.384A in identifying the band 2500-2690 MHz for IMT-2000 will expedite the roll out of mobile broadband service throughout the world.

Canadian Footnotes SUP C39 should be withdrawn because of the potential for interference to cause restricted use of the remaining part of band.

The addition to the Canadian footnotes whereby the mobile use of the band is subject to future spectrum policy and licensing conditions should indicate that current licensees can implement mobile services right away just as we can do now in our United States systems in Hawaii and California. Without this certainty our access to capital for our Canadian operations
will be constrained and the roll out of new networks will be unnecessarily delayed.

2. Channelling Plan
RESPONSE:
Within our current band of spectrum we are able to implement both a low powered cellular mobile broadband network and to continue to operate our legacy high powered fixed network (while meeting all regulatory requirements). In order to avoid interference between our two networks we will need some guard band, however we can organize that with ourselves.

3. Use of the 2500 MHz band in Canada
RESPONSE:
The entire 2500 MHz band should be used to deliver mobile broadband services and over time the high powered first generation fixed networks should be phased out and replaced with new low powered cellular networks. Given time, MDS operators could meet broadcast commitments over mobile networks.

4. Spectrum Currently not assigned.
RESPONSE:
In those regions where the MDS spectrum has not been allocated, the best use for the spectrum is for mobile IP broadband services.

5. Internet Access by MDS operators.
We endorse the Department’s entire proposal to allow MDS operators to use up to 50 percent of the MDS spectrum for non-broadcasting services as forward thinking and very reasonable.

Thank you for the opportunity to comment.
Yours truly,
Boyd Craig
Chairman
Craig Wireless