

Thank you for the opportunity to comment on this.
I'm only going to comment on a few of the sections.

1. 11.3 Q8

It seems to me that any additional flexibility is adding value to the existing licenses, and that this should not turn into a windfall for the companies lucky enough to benefit.

Is it possible to have licensees buy the additional flexibility ? This would fit with the idea of auctioning the spectrum in the first place. It seems reasonable to assume that the price would have been higher if the additional flexibility had been included in the license that was originally auctioned. Clearly, it might be difficult to set a fair price.

An alternative would be to offer licensees the option of shortening their existing license but gaining the additional flexibility or leaving it at the same length without the additional flexibility.

I am mostly concerned that the public should get some benefit in return for the benefit that the licensees would receive.

11.6 Q15

It seems unreasonable to grant licenses on a First-Come-First Served basis with no deployment requirements. If a license is granted in this way and a party later appears that wants to actually use the spectrum in question, they would have to approach the speculator. This seems to be simply ensuring that the speculators make money that would otherwise go into the public purse.

11.7 General

It seems to me that the technologies discussed in this section lead to a serious weakening of the argument used in section 11.2 regarding "economies of scale". As SDR becomes more common, we will have readily available parts and devices that can access wide frequency ranges and be programmed to use particular bands. Thus it would be possible to have the same hardware with a different software load used in, for example, Europe and Canada to operate in different frequency bands. This is certainly a factor that needs to be considered when setting spectrum policy.

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