

**Comments – Gazette Notice DGTP-001-02: Consultation on Revisions to the  
Spectrum Utilization Policies in the 3-30GHz Frequency range.**

The Global VSAT Forum (GVF) is hereby providing its comments to this Gazette Notice.

The GVF is the independent U.K.-based, non-partisan and non-profit organization representing every major world region and every sector of the VSAT industry, including satellite operators, VSAT network operators, VSAT manufacturers, system integrators, value added and enhanced service providers, telecom carriers, and users.

The GVF has more than 100 members in 34 countries and serves as the unified voice of the industry in regulatory, policy and trade fora. The association coordinates regulatory and policy solutions at the national, regional and global level, and supports educational and promotional programs in every nation of the world.

In providing its comments to this Gazette Notice, the GVF is acting on behalf of its members that have interests in the Canadian satellite services, whether as satellite operators, satellite service providers, or as VSAT manufacturers and system integrators.

The comments are designed to further the public interest, where satellite delivered services have a proven track record in this respect, and also to further the Canadian satellite industry's interests, which result in the employment of many thousands of Canadians, coast to coast. The comments recognize the proven importance of satellite communications for Canada with its large geographical size stretching east to west over 6 time zones, and between the populated regions of the south with the sparsely populated regions of the north.

The prime thrust of the comments concerns the Ku-band which is of main interest to the VSAT business. However, comments are also provided concerning the C- and Ka-bands.

Provided below are the following GVF Comments:

***Ku-bands***

- (1) The GVF supports the provision of full flexibility for the deployment of fixed-satellite service earth stations in the bands 10.7-11.7 GHz and 12.7-13.25 GHz on a coordinated first-come-first-served basis with the fixed service in order to stimulate the development of the available Canadian orbital positions and advance competition in satellite offerings. Consequently, the GVF does not support the retention of the domestic footnote C16A for FSS in these bands or to extend its application to the entire band 10.7-11.7 GHz.
- (2) The GVF takes a further step and proposes that a truly co-primary, coordinated approach and allocation be established for the FSS and existing users in the 13.75-14.0 GHz extended Ku-band spectrum. Additional Ku-band spectrum is urgently

needed for the provision of high-speed, two-way multimedia consumer services. Transponder capacity in the conventional Ku-band is increasingly limited and the amount of spectrum equates directly to the numbers of subscribers satellite companies are able to serve.

### ***Ku-band and C-band Shared with FS***

- (3) The GVF does not support coordination requirements similar to the approach described in the FCC proposal for partial-band licensing of C-band or Ku-band earth stations in the fixed-satellite service in bands shared on a primary basis with the terrestrial-fixed service. The GVF instead supports continued coordination between these co-primary services conducted pursuant to first-come, first-served principles and that protection from harmful interference is afforded to those systems that coordinate for as long as operators hold valid licenses.

### ***C-bands***

- (4) The GVF supports the migration of the conventional C-band from co-primary FS and FSS to a primary designation for fixed-satellite service.
- (5) However, subject to satisfactory segregation criteria being established, the GVF may also support the segregation between fixed and fixed-satellite services in either mutually exclusive geographic areas, or for mutually exclusive portions of the C-band frequency spectrum as long as the spectrum made available to satellite systems is adequate to sustain the economics required.
- (6) The GVF supports full flexibility for the deployment of fixed-satellite earth stations in the allotment C-bands in Canada on a coordinated first-come, first-served basis with the fixed service in order to stimulate the development of the available Canadian orbital positions and advance competition in satellite offerings. Consequently, the GVF does not support the retention or the application of domestic footnote C16A for FSS in the bands.

### ***Ka-bands***

- (7) The Notice states that preliminary input indicates that the bands could be “soft partitioned” to emphasize the implementation of the particular services highlighted in the tables, with access by co-primary services on a more restricted basis. Before commenting substantially on the Department’s concept of “soft partitioning”, the GVF would need to understand all aspects of the concept and the manner in which it would be implemented.
- (8) The GVF considers that international regulations are sufficient for the implementation of both GSO and NGSO FSS systems in these bands.

(9) The GVF does not consider there is a need to distinguish between FSS service links (consumer access) for NGSO or GSO systems in the context of access to portions of the bands.

(10) The GVF does not consider there is a need to distinguish between FSS feeder links for NGSO or GSO systems in the context of access to portions of the bands.

In conclusion, the Global VSAT Forum would like to express its gratitude to Industry Canada in being given the opportunity to provide comments to this Notice. GVF would be pleased to submit more specific comments should the Department have questions or further information requirements.

Respectfully,

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