



February 25, 2011

*Filed Electronically*

Manager, Mobile Technology and Services  
Engineering, Planning and Standards Branch  
Industry Canada  
300 Slater Street  
Ottawa, ON K1A 0C8

Dear Sir/Madam:

Re: Government of Saskatchewan Comments – Canada Gazette Notice No.  
SMSE-018-10 consultation on a Policy and Technical Framework for the 700 MHz  
Band and Aspects Related to Commercial Mobile Spectrum

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The Government of Saskatchewan is following, with great interest, the consultation and discussions on the 700 MHz band auction. This spectrum is of specific concern for the Government given its potential to serve our rural residents with advanced wireless broadband services, which we believe will ultimately assist in reducing the digital divide.

Access to the broadband capabilities associated with new wireless networks is becoming increasingly important if our rural residents are to participate in the new digital economy. It is our belief that any auction must have mechanisms to ensure that this unique spectrum is used to that effect.

In past auctions and allocations of spectrum, licences were given with limited regard to the impact it could have on consumers, particularly rural consumers. As a result of these licence rules, this very scarce commodity has been often withheld from use for speculative purposes. Given the tremendous growth in the need for data this is unacceptable.

The Province of Saskatchewan would request that Industry Canada place conditions on any licence holder which:

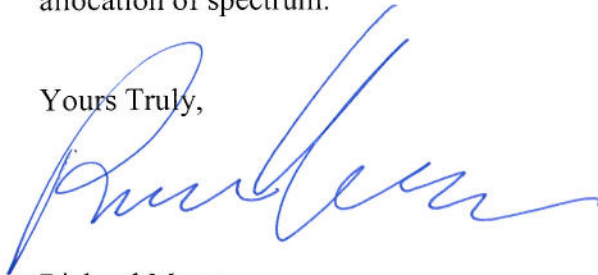
- Ensures that the licence holder uses the spectrum they purchased within a reasonable amount of time, with the understanding that a company may need some
- Time to develop their business. It is our estimation that five years would be appropriate; and
- Ensures that the rural residents who live within any spectrum tier are given an equal opportunity to their urban counterparts to access the advanced services associated with the latest wireless broadband networks using this scarce public resource. We believe this can only be accomplished by ensuring that the auction rules require successful bidders to actually deploy the spectrum in rural areas.

We believe that these conditions will be crucial in achieving the objectives of both the Federal and Provincial governments in enhancing access to the global economy by our rural residents.

The Government of Saskatchewan also supports Industry Canada's proposal to designate a portion of the 700 MHz spectrum for public safety use, and we feel that the most effective means to ensure this spectrum is efficiently utilized is to place this spectrum under the control of the provincial public safety entities. The use of broadband applications within the public safety sector is becoming increasingly important. It is our belief that the province, as the major coordinator and funder of public safety, should be the nexus in assigning the use of this spectrum as it deems appropriate. In this way, the province will be able to ensure connectivity between all municipal and other public safety agencies.

I trust that these concerns will be noted by Industry Canada in its efforts to serve the best interests of all Canadians. It is our intent to monitor this consultation process with a view to ensuring that our residents benefit from this important allocation of spectrum.

Yours Truly,



Richard Murray  
Executive Director, Corporate Services  
Saskatchewan Information Technology Office

RH/mr