



Telesat Canada
1601 Telesat Court
Gloucester, Ontario
K1B 5P4

November 2, 2004

Fernand Léger
Director of Spectrum & Radio Services
Industry Canada
Room 1611A, 300 Slater Street
Ottawa, Ontario
K1A 0C8

Dear Sir:

**Re: Notice No. DGTP-008-04 – Revisions to Spectrum Utilization Policies
in the 3-30 GHz Frequency Range & Further Consultation**

Telesat Canada (“Telesat”) is pleased to submit the following comments in response to the above referenced Notice, published in the *Canada Gazette*, Part 1, dated October 1, 2004. This Notice invites interested parties to submit comments on the *Provisional Changes* set out in the document, and, at a later date, on other items identified for further consultation. These comments focus on the *Provisional Changes*.

At the outset Telesat would note that it is a member of the Radio Advisory Board of Canada (“RABC”) and has reviewed the submission prepared by the RABC’s Fixed Wireless Communications Committee supporting the *Provisional Changes* impacting the 13.75-14.00, 19.3-19.7 and 29.1-29.25 GHz bands proposed by Industry Canada (“the Department”) in the Notice. Telesat is in agreement with the RABC’s position on these bands but has some supplementary comments as follows.

13.75-14.0 GHz Band (Earth-to-Space)

The Department has provisionally adopted the changes agreed to at WRC-03, namely: removing the limitation to antenna diameters of 4.5 metres or larger; allowing antennas of diameters as small as 1.2 metres but with restrictions in coastal and border areas; and imposing limitations in parts of the band to protect the space research service. These changes are important for the Canadian satellite industry since they, together with the companion changes to policy affecting the associated space-to-Earth bands, mean that extended Ku-band frequencies at Canadian orbital positions will become more commercially viable. Telesat therefore fully supports these proposed changes.

To allow Canadian satellite operators to take full advantage of these changes, Telesat would also urge the Department to ensure that valid Canadian ITU filings exist for all the extended Ku-band frequencies at orbital locations of interest to Canada (i.e., at the 107.3, 109.2, 111.1, 114.9, and 118.7 ° WL orbital locations).

Also in regard to the extended Ku-band, Telesat notes that domestic footnote C41 pairs the extended Ku-band uplink (13.75-14.0 GHz) with the 11.45-11.7 GHz downlink, but that the Department has indicated at page 22 of the Notice that it “could consider alternative pairings”. Telesat would appreciate clarification on whether the Department would consider favourably pairings of the 13.75-14.0 GHz band with the 10.95-11.2 GHz band, or (through spatial reuse in the uplink direction) with both the 10.95-11.2 GHz and the 11.45-11.7 GHz bands. Should this be the case, Telesat believes it would be appropriate for the Department to amend footnote C41.

19.3-19.7 GHz and 29.1-29.25 GHz Bands

FS will be given priority over FSS in the 19.3-19.7 GHz band in the same fashion as in the 17.8-18.3 GHz band, by virtue of new footnote C16D. The Department also proposes to delete the existing allocation for FSS in the Earth-to-space direction and to restrict use of the band for FSS in the space-to-Earth direction to MSS feeder links in accordance with new footnote CYY. Priority to FS is similarly being proposed in the 29.1-29.25 GHz band under new footnote C16G, with FSS use of the band limited to MSS feeder links in a new footnote CZZ.

Telesat notes that the Department has aligned its Ka-band policies with those of the FCC, and within 10 years a full 1000 MHz in both directions will be available for ubiquitous Geostationary FSS use. Furthermore, priority has been granted to the FSS in the former “Teledesic Bands” (18.8-19.3 and 28.6-29.1 GHz), although the type of FSS use will be the subject of a future policy decision. These bands represent a potential additional 500 MHz of exclusive bidirectional spectrum for satellite use. Further, Telesat is the operator of MSS feeder link earth stations at Whitehorse and Iqaluit using the 19.3-19.7 GHz and 29.1-29.35 GHz bands.

Telesat therefore has no objections to the proposed changes in the 19.3-19.7 GHz and 29.1-29.25 GHz bands.

More generally, Telesat supports the changes made by the Department in all portions of the Ka band, but for greater clarity would suggest the addition of the words “including ubiquitous fixed satellite services” following “deployment of fixed-satellite services” in the second sentence of new footnotes C16E and C16F.

Telesat appreciates the opportunity to provide its comments on these important matters, and looks forward to participating in the further consultation portion of this proceeding.

Yours truly,



Robert Power
Director, Regulatory & Government Initiatives