

July 6 2017

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**Re: Notice of Application Received from TerreStar Solutions Inc. for a Tier 1 Spectrum Licence
in the 1695–1710 MHz Frequency Band and the in PCS Block H**

Good day,

The BC Broadband Association (“BCBA”) requests that ISED accept these comments, submitted after the reply deadline.

The BCBA submits that ISED should reject this application by TerreStar. By granting this license, ISED would undermine the investments of small rural wireless internet service providers, who have been building fixed wireless networks to bring broadband connectivity to rural Canada for over 20 years.


If this spectrum can be made available for fixed wireless services in rural Canada, then the spectrum should be auctioned for that purpose. A direct award of a Tier-1 licence would be contrary to ISED’s commitment to use market forces to allocate spectrum.

Indeed, the BCBA supports the allocation of more spectrum for fixed use in rural areas of Canada. More spectrum is desperately needed by the small businesses that build rural fixed wireless networks. These providers are offering high speed broadband connectivity using scarce un-licensed and lightly-licensed spectrum, and many would be able to offer 50 Mbps services through incremental investment if this spectrum were to become available.

An important part of bridging the digital divide, and of achieving the CRTC’s broadband service objective, is making spectrum available to small rural wireless internet service providers. This can be achieved through auction rules such as smaller licensing areas to target rural populations, set-asides for regional providers, and meaningful deployment requirements. This will not be achieved by awarding tier-1 licenses to national providers.

Thank you again for considering our comments.

Sincerely yours,



Bob Allen
President – BCBA

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