

November 30, 2020

Innovation, Science and Economic Development Canada  
c/o Director, Spectrum Regulatory Best Practices  
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Re: **Gazette Notice No. SLPB-002-20**: Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band | August 2020 – BCBA Reply Comments

Dear Sir/Madam,

The British Columbia Broadband Association (BCBA) is writing to assist and stand behind CanWISP's submission to the reply comments for the changes to the frequency allocation of 3650 – 3700 MHz. After examining Option 1 and Option 2 we have decided to endorse only Option 1 and oppose Option 2. We strongly urge ISED to adopt Option 1 as written in CanWISP's submission and to allocate an additional 30 MHz of frequency from 3700 to 3730.

There are many members within the BCBA that would suffer serious financial harm if anything but Option 1 is implemented. These TSPs would immediately suffer serious losses to their business valuation and would no longer be able to continue to invest in bringing improved services to their customers if Option 2 is selected.

We trust that ISED will seriously reconsider its plan to require rural TSPs to abandon their business models and leave thousands of rural Canadians with no Internet service at all..

Sincerely yours,



**Bob Allen**  
President  
BC Broadband Association