

November 26, 2020

Adam Scott
Director General
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Subject: 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 (SLPB-002-20), August 2020

Dear Mr. Scott,

We are submitting this letter in response to the 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 (SLPB-002-20), in support of Telesat's C-band reallocation proposal. We have been briefed by Telesat on the two proposals that are being considered as part of this Consultation and would like to emphasize our strong support of Telesat's proposal.

NAV CANADA relies on a C-band satellite network to transfer aircraft position data from our remote radar locations to our main air traffic control centers. Locations that receive both data and voice are Edmonton, Dorval, Gander, and North Bay.

While we understand that the reallocation of C-band spectrum to 5G is taking place around the world and will inevitably occur in Canada, we are deeply concerned about our services and the costs of a transition. Over the years, NAV CANADA has made a significant financial investment in C-band ground infrastructure at these remote sites. Telesat proposes to manage the clearing process, to cover all of the costs associated with any satellite or transponder moves paid through the sale of the spectrum to wireless companies. Furthermore, Telesat guarantees uninterrupted service during and after the transition.

We have been working with Telesat for +15 years and are confident that they are committed to providing us access to affordable, high-speed broadband service using C-band today and LEO in the future.

We are pleased to submit this letter for your consideration in order to underline the criticality of broadband connectivity and reiterate our strong support of Telesat's

proposal and the promise of Telesat LEO to deliver high-speed low latency broadband connectivity to our communities in the future.

Thank you in advance for your consideration.

Sincerely,

Mark Cooper

[Mark Cooper \(Nov 26, 2020 10:12 EST\)](#)

Mark Cooper
VP & Chief Technology and Information Officer
NAV CANADA