



**Reply Comments for:**

**Consultation on a Policy and Licensing Framework for Spectrum in the  
3800 MHz Band**

Canada Gazette, Part 1, SLPB-006-21

December 15, 2021

Spectrum Management and Telecommunications

**March 21<sup>st</sup>, 2022**

## Introduction

1. Iristel, Inc. ("Iristel"), on behalf of itself and its affiliates Ice Wireless Inc. ("Ice Wireless") and i-MobileCA Inc., submits these brief reply comments, in response to comments in the proceeding for Innovation, Science, and Economic Development Canada's ("ISED") Consultation on a Policy and Licensing Framework for Spectrum in the 3800 MHz Band (the "Consultation").
2. Iristel maintains the positions laid out in its 15 February 2022 comments with the exception of the point below.

## General Comments

3. In its response to ISED's question on pro-competitive measures, CanWISP proposed the following modifications to ISED's three options in rural areas<sup>1</sup>:
  - a. A 160 MHz set-aside in rural service areas, with 80 MHz of this set-aside reserved for small telecommunications service providers; along with*
  - b. An 80 MHz cross-band cap in rural service areas; and*
  - c. An 80 MHz set-aside and 100 MHz cross-band cap in urban service areas.*
4. CanWISP's proposal is comparable to Iristel's and goes further in suggesting that ISED adopt two tiers of set-aside spectrum, one for regional competitors (Eastlink, Quebecor, Sasktel, Shaw, Xplornet)<sup>2</sup> defined as "RMSPs" in CanWISP's submission.
5. CanWISP's proposal is superior to Iristel's and would provide even more benefits to rural and remote communities. Iristel fully endorses this proposal.
6. In the event that ISED does not adopt the pro-competitive measures proposed by CanWISP, the measures recommended by Iristel should be adopted in the alternative.
7. Iristel appreciates the opportunity to provide its brief reply comments for this consultation.

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<sup>1</sup> Comments of CanWISP, paragraph 34

<sup>2</sup> Comments of CanWISP, paragraph 12