



24 April 2017

Martin Proulx
Director General
Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada (ISED)
6th Floor, 235 Queen Street
Ottawa, ON K1A 0H5

RE: Consultation on Licensing Framework for Non-Geostationary Satellite Orbit (NGSO) Systems and Clarification of Application Procedures for All Satellite Licence Applications (SMSE-009-17)

Dear Mr. Proulx:

Further to comments posted on ISED's website on 19 April 2017, GHGSat notes that most other parties are considering ISED's proposals from the point of view of NGSO FSS/MSS operations in the bands listed in Annex A of the Policy.

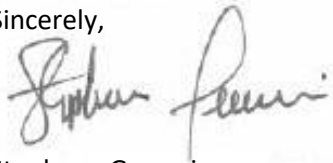
GHGSat's primary concern is that NGSO systems operating in bands NOT listed in Annex A of the Policy be excluded from ISED's proposals.

Specifically, in bands NOT listed in Annex A of the Policy:

- There should be no limits to number of licenses
- There should be no changes to Canadian direction and control requirements
- Canadian coverage and capacity requirements should not apply
- The coexistence criterion should remain
- Implementation milestones should not be any more onerous for small constellations
- Coordination disputes should still be resolved by the parties

GHGSat emphasizes that the proposals should not be generalized to all NGSO systems, since such generalization would adversely affect several Earth Observation system operators.

Sincerely,



Stéphane Germain
President & CEO
GHGSat Inc.