

VIA EMAIL

May 11, 2017

Mr. Martin Proulx  
Director General  
Engineering, Planning & Standards Branch  
Innovation, Science & Economic Development Canada  
235 Queen Street, 6<sup>th</sup> Floor  
Ottawa, ON K1A 0H5  
Email: [ic.satelliteauthorization-autorisationsatellite.ic@canada.ca](mailto:ic.satelliteauthorization-autorisationsatellite.ic@canada.ca)

Dear Mr. Proulx:

**Re: Reply Comments to the *Consultation on the Licensing Framework for Non-Geostationary Satellite Orbit (NGSO) Systems and Clarification of Application Procedures for All Satellite Licence Applications, Canada Gazette, Part I, March 4, 2017***

1. This letter is submitted to the Department of Innovation, Science & Economic Development Canada (“ISED” or “the Department”) in connection with the above-noted consultation (the “Consultation”) by Northpoint Spectrum Development and Meridian Global Connection Inc.
2. We have reviewed, endorsed, and affixed our signatures to the comments of the Coalition of satellite operators. In those comments we generally concur with the position espoused regarding Section F of the Consultation, and also provide further comments and proposals for consideration by the Department.
3. MGC and Northpoint agree with the proposed milestone dates and constellation percentage proposals made by SES/Ciel/O3b – ie. 33% at year 6 and 75% in year 9. We would however encourage the Department to carefully consider attempts to warehouse spectrum by any parties that may hold multiple spectrum licences. Furthermore, a certain amount of flexibility should be awarded by the Department for unforeseen events such as market, technology, or business changes before penalty measures are undertaken.
4. We are pleased to provide our reply comments to the Department, and welcome the opportunity to comment on this important Consultation and the issues herein.

Yours very truly,



David Lewis  
Chairman & CEO  
Northpoint Spectrum Development Inc., and Meridian Global Connection Inc.

cc: Brian Olsen, President