October 4, 2021

Innovation, Science and Economic Development Canada
Senior Director, Space Services and International
Engineering, Planning and Standards Branch
235 Queen Street (6th Floor, East Tower)
Ottawa ON K1A 0H5

Via Email: satelliteauthorization-autorisationsatellite@ised-isde.gc.ca

RE: CONSULTATION ON UPDATES TO THE LICENSING AND FEE FRAMEWORK FOR EARTH STATIONS AND SPACE STATIONS IN CANADA, CANADA GAZETTE, PART I, AUGUST 4, 2021, NOTICE REFERENCE NUMBER: SMSE-009-21

1021823 B.C. Ltd., a wholly owned subsidiary of WorldVu Satellites Limited (d/b/a "OneWeb"), appreciates the opportunity to provide comments to the Innovation, Science and Economic Development Canada ("ISED") Consultation on the licensing and fee framework for earth stations and space stations in Canada.

As a member of Global VSAT Forum ("GVF"), OneWeb fully endorses the GVF submission regarding this consultation. In addition, OneWeb respectfully submits the comments in Attachment A which represent its additional views on certain questions presented in the Consultation.

OneWeb looks forward to working with ISED to create policies that promote the deployment of broadband connectivity to all parts of Canada.

Respectfully submitted,
WORLDVU SATELLITES LIMITED,

/s/ Eric Graham

Eric Graham
Director of Government and Regulatory Engagement, North America
1785 Greensboro Station Place
McLean, VA 22102
egraham@oneweb.net

ATTACHMENT A

CONSULTATION ON UPDATES TO THE LICENSING AND FEE FRAMEWORK FOR EARTH STATIONS AND SPACE STATIONS IN CANADA

ONEWEB RESPONSES TO CONSULTATION QUESTIONS

Section 6.2 – Earth station spectrum licences requiring site approval

Q2
ISED is seeking comments on its proposals to:

a. implement spectrum licences that require site approvals for all earth stations described above operating in any frequency band
b. collect and assess the technical information listed in annex B as part of the site approval process
c. require earth station licensees with site-approved spectrum licences to hold licences for entire spectrum blocks, as per relevant SRSPs

OneWeb agrees with ISED's proposal regarding spectrum licences for large earth stations on a site approval basis. OneWeb would also submit that a minimum separation distance is generally needed between the gateways of different NGSO systems. The required separation distance would depend on the specific technical and operational characteristics of the concerned systems and should be negotiated during coordination discussions between the concerned NGSO operators after detailed analyses.

In the absence of a coordination agreement between two NGSO systems, OneWeb believes that new gateway earth station licences should not be issued for locations within an established distance of a licenced gateway earth station. Alternatively, ISED could consult with the operator of the licensed gateway and request that they conduct analyses to determine what separation distance is feasible.

Section 6.3.1 – Frequency bands where generic spectrum licences will be available

Q6
ISED is seeking comments on its proposals to allow generic spectrum licensing systems of identical fixed earth stations and ESIMs in the frequency bands discussed above.

10.7-10.95 GHz and 11.2-11.45 GHz (space-to-Earth)

OneWeb supports ISED's proposal to allow generic licensing for both fixed earth stations and aeronautical and maritime ESIMs on a no-protection, no-interference basis in this band. OneWeb further supports extending generic licensing to fixed FSS terminals, land ESIMs, and transportable earth stations on a no-protection, no-interference basis, given that these earth stations would not impact other co-primary services.

10.95-11.2 GHz and 11.45-11.70 GHz (space-to-Earth)

OneWeb supports ISED's proposal to allow generic licensing for fixed earth stations, transportable earth stations, and all three types of ESIMs in these bands.

Additionally, OneWeb supports an indefinite extension of the current moratorium on the licensing of fixed service systems in the 11.075-11.2 GHz and 11.575-11.7 GHz portions of the band. OneWeb and other NGSO FSS operators use Ku-band spectrum for links to user terminals. By extending the moratorium in these portions of the band, ISED could expand the space-to-Earth capacity for these NGSO systems, thereby promoting the rapid deployment of broadband service in Canada.

11.7-12.2 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space)

OneWeb supports ISED's proposal to allow generic licensing for both fixed earth stations, transportable earth stations, and all three types of ESIMs in these bands.

12.2-12.7 GHz (space-to-Earth)

OneWeb supports ISED's proposal to allow generic licensing for both fixed earth stations, transportable earth stations, and all three types of ESIMs communicating with NGSO systems based on footnote 5.487A, which recognizes that the band may be used by NGSO systems.

Importantly, OneWeb noted ISED's comment that this band may be subject to future consultation. It is essential that terrestrial services are not allowed to encroach upon this band in any future consultation. This spectrum offers a unique opportunity for a globally harmonized space-to-Earth band for transmissions to NGSO FSS user terminals (as well as other space-to-Earth uses). Terrestrial services in this band would create overwhelming harmful interference to NGSO FSS user terminals which makes coexistence impossible.

Section 7.2.2 – Generic earth station spectrum licences for fixed earth stations and ESIMs

Q16
ISED is seeking comments on its proposal to assign a consumption-based fee to generic earth station spectrum licenses for fixed earth stations and ESIMs at the rate of $5/MHz.

OneWeb believes consumption-based licencing fees discourage deployment of broadband services and run counter to the goal of expanding access. With satellite constellations now coming online that offer the opportunity for true broadband speeds in locations which never before have been connected, much less connected at modern speeds, ISED's goal should be to establish a fee structure that promotes deployment of these networks and broad distribution of user terminals.

If ISED proceeds with its proposed fee for generic earth station spectrum licenses for fixed earth stations and ESIMs, the proposed fee of $5/MHz is simply too high. By way of example, the OneWeb system utilizes the Ku-band for user terminals. In circumstances where blanket licenses are requested, OneWeb believes a fee of $1/MHz is the highest amount that would be appropriate and would better reflect the use and value of the spectrum for that purpose, particularly when taking into account the coordination requirements that could limit the actual value of the spectrum to operators.

Finally, given that satellite operators use the Ku-band and Ka-band for similar and/or identical use cases, ISED should establish the same licencing fees between these bands to ensure a level playing field for competition.