

**Consultation on a New Set of Service Areas for Spectrum Licensing –  
Suncor Energy Services Inc.**

**RE: Canada Gazette, Part I, November 27, 2018: DGSO-002-18**

**Question 1: Design Principles**

**Q1A - ISED is seeking comments on the proposed design principles when providing responses, include supporting arguments for or against the proposed principles.**

**Comments:**

**Recognize geographic differences: consider the unique characteristics of urban and rural areas in Canada**

- Supportive of “alternative licencing approaches for different areas”, as this will make it financially feasible for companies like Suncor to licence spectrum in their immediate operating areas.

**Foster demand: areas should have either a population base or some economic value to support commercial viability**

- Supportive of the comments in the “fostering demand” section that identifies each service area should include “some economic value” that would foster demand for acquiring spectrum. This would enable our industrial requirements in areas that are not heavily populated.

**Maintain technological and competitive neutrality: not favouring or discriminating against one technology or group of stakeholders over another**

- Agree.

**Ensure boundaries are in low population areas to minimize potential interference issues.**

- Agree.

**Ensure areas nest within the existing Tier 4 service areas to maintain continuity with ISED’s existing licensing structure.**

- Agree.

**Use the ISED’s existing grid cells as constituent building blocks.**

- Agree. Supportive of maintaining use of grid cell areas as it is consistent with the rest of the tier hierarchy. Minimum size of grid cell is appropriate.

**Q1B - ISED is seeking any suggestions on additional design principles that should be considered.**

**Comments:**

- We would recommend particular consideration with respect to surface lease boundary considerations (eg. Allocated MSL) to provide particular Tier 5 boundaries that correlate to industrial operations.

**Question 2: Option 1 – Boundaries based on Statistics Canada 2016 census subdivisions**

**Q2A - ISED is seeking comments on the suitability of Option 1 in addressing the proposed design principles.**

**Comments:**

- Option 1 addresses all of the proposed design principles with the exception of interference minimization. The use of CSDs might make interference minimization in large urban areas more difficult unless CSDs are combined (see question 2B).

**Q2B - ISED is seeking comments on whether adjacent urban CSDs should be combined into a single service area.**

**Comments:**

- Although it likely will not impact Suncor's requirements, adjacent urban CSDs should be combined into a single service area to support the proposed design principle on interference minimization.

**Q2C - ISED is seeking comments on whether there should be a minimum or maximum size for the service areas and if very small CSDs should be amalgamated into the larger surrounding or adjacent CSD.**

**Comments:**

- There should be a minimum size for service areas to prevent disruptive/speculative acquisition of spectrum in very small CSDs. Very small CSDs should be amalgamated into the larger surrounding or adjacent CSD. There should be a maximum size to ensure that the Tier 4 and Tier 5 service areas are not the same size and should be consistent with operating lease boundaries.

**Q2D - ISED is seeking comments to gauge if this option is suitable for northern and rural areas.**

**Comments:**

- Option 1 is more suitable for northern and rural areas where there might be localized industrial applications for spectrum. It would allow a company like Suncor to only license the specific area of interest rather than all of the "non-urban" areas. This is well aligned with our requirements.

**Question 3: Option 2 – Boundaries based on population centres**

**Q3A - ISED is seeking comments on the suitability of Option 2 in addressing the proposed design principles.**

**Comments:**

- Option 2 does not address the Foster Demand or the Technological and Competitive Neutrality design principles, particularly in rural and northern areas.

**Q3B - ISED is seeking comments on the proposed minimum population for small population centre service areas. A rationale should be provided if a different population is proposed.**

**Comments:**

- No comment.

**Q3C—ISED is seeking comments on whether the “other” service areas (remainder areas in each Tier 4) should be licensed differently (e.g. on a shared or first-come, first-served basis).**

**Comments:**

- If Option 2 is selected, then the “other” service areas must be licenced differently (ie: shared) so that separate/different industrial applications can function even though they all coexist in a single “other” service area. Suncor does not support a first come, first served basis for the “other” service areas

**Q3D - ISED is seeking comments on whether this option is suitable for northern or rural areas.**

**Comments:**

- Option 2 is not materially different from Tier 4 in northern and rural areas and will not help Suncor achieve what is needed. Based on this option 2 is not suitable.
- Not suitable in addressing the Technological and Competitive Neutrality design principles, particularly in rural and northern areas.

**Q3E - ISED is seeking comments on whether population centres, which have adjacent boundaries, should be amalgamated to form a single service area.**

**Comments:**

- No comment