



HUNTER

COMMUNICATIONS CANADA, INC.

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ISED

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Canada Gazette, Part 1, Volume 154, Number 37: Government Notices Notice No. SLPB-002-20 Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band

Hunter Communications is pleased to respond to Canada Gazette Notice No. SLPB-002-20 *Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band*.

While Telesat is the only satellite operator licensed by ISED to operate in C-band, there are many other satellite operators authorized to provide satellite services in Canada in C-band and other bands. A brief look at the List of Foreign Satellites Approved to Provide Fixed-Satellite Services FSS in Canada gives a count of 90.

Many of these satellites have partial coverage of Canada and provide transatlantic or other similar services. But many have substantial coverage of Canada and compete directly with Telesat for Canadian businesses. These satellites, approved under Canadian policy have helped to provide a competitive satellite communications environment in Canada.

Hunter, for example, owns a hosted Ku-band payload on Eutelsat's E115WB, a satellite on the approved list. The Hunter beam has the highest-power Ku-band service in Canada including the Arctic. Hunter also resells Intelsat C-band service in Canada to a number of companies. As one example, with this combination of capabilities, Hunter was able to provide CBC-Radio Canada with a winning combination of Ku-band and C-band services meeting its requirements with substantially better pricing. Thus, as a participant in the Canadian satellite communications market, including C-band, Hunter has a direct interest in the outcome of this consultation.

Instead of responding to the 59 questions in detail, Hunter prefers to provide the following general comments:

Hunter supports the ISED proposal contained in the consultation document. It is coordinated with the FCC mandated transition in the U.S., providing for a consistent North American

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satellite communications environment.

Hunter opposes the Telesat proposal. The ISED proposal already reduced the C-band supply in Canada by 60% - Telesat's proposal would further reduce the remaining 200 MHz – that additional reduction will restrict supply by an additional 50%, which by economic certainty will result in a material increase in price for services delivered to satellite-dependent communities. It is ISED's stated goal to decrease the cost of internet to all communities, and allowing Telesat to further decrease the supply will result in the opposite effect.

To the extent that the transition, under the Telesat proposal, is managed by Telesat, it will be unfair to the other satellite operators, independent Canadian teleport operators and service providers and their customers. While Telesat is the only satellite operator in Canada licensed to operate in C-band in Canada, many competitors are approved to operate in Canada and are legitimate and important participants in the Canadian satellite market.

Under the Telesat proposal, Telesat will be financially compensated through the proceeds from the auction of C-band spectrum to 5G operators, but it is unfair to compensate just one participant. If Telesat is to be compensated for the transfer of spectrum from satellite to other services then other participants – both operators and service providers of C-band services, must be compensated as well. Telesat is being profitably compensated in the US where they are not a US-licensed operator (but authorized). Any compensation in Canada must therefore be equitably paid to both licensed and authorized current users of C-band. Telesat's proposal that only Telesat should be compensated is grossly unfair and unsuitable for the competitive satellite communications market in Canada.

CBC-Radio Canada and Intelsat will provide their own detailed comments in response to this consultation process. Hunter, as a participant in the Canadian satellite communications market, respectfully submits these general comments and supports the comments of CBC-Radio Canada and Intelsat.

Yours truly,

Brent Perrott
President
Hunter Communications Canada