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November 26, 2020

Adam Scott
Director General
Spectrum Licensing Policy Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, Ontario
K1A 0H5

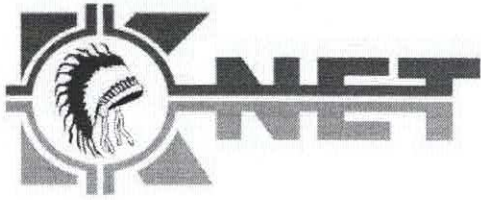
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Subject: Consultation on the Technical and policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band (SLPB-002-20), August 2020

Dear Mr. Scott,

We are submitting this letter in response to the 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 (SLPB-002-20), in support of Telesat's C-band reallocation proposal. We have been briefed by Telesat on the two proposals that are being considered as part of this Consultation and would like to emphasize our support of Telesat's proposal.

The Kuhkenah Network (K-Net) provides information and communication technologies (ICTs), telecommunication infrastructure and application support in First Nation communities across a vast, remote region of north-western Ontario as well as in other remote regions in Canada. This private telecommunications network supports the development of online applications that combine video, voice and data services requiring broadband and high-speed connectivity solutions. K-Net is a program of Keewaytinook Okimakanak (KO), a First Nations Tribal Council established by the leaderships of Deer Lake, Fort Severn, Keewaywin, McDowell Lake, North Spirit Lake and Poplar Hill First Nations to provide a variety of second level support services for their communities. Based out of Sioux Lookout Ontario, K-Net materializes a wide range of capacity building services visualized by First Nations; such as cellular service, broadband connectivity, and online applications.



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KNET's first began its relationship with Telesat in 1995. Over the years, KNET has made a significant investment in ground infrastructure and today relies on +4 C-band transponders to deliver critical broadband services to 6 communities in north-west Ontario.

Broadband connectivity is essential to our communities. C-band spectrum connects us to the rest of Canada and the World. We are concerned about the repercussions of this spectrum reallocation process, particularly in terms of the continuity of broadband services offered to our communities and the financial repercussions of the process. We must ensure our communities continue to receive essential broadband services, whether it be for health, government, financial services, telephony, home internet, remote work or online education. Our communities rely on this crucial broadband to connect locally, for work, school, and to access lifeline services especially since the beginning of the pandemic.

While we understand that the reallocation of C-band spectrum to 5G is taking place around the world and will inevitably occur in Canada, we are concerned about our services and the costs of a transition. Telesat proposes to manage the clearing process, to cover all of the costs associated with any satellite or transponder moves paid through the sale of the spectrum to wireless companies. Furthermore, Telesat guarantees uninterrupted service during and after the transition, which is of utmost importance to us and our communities.

We have been working with Telesat for the past 25 years and are confident that they are committed to providing us access to affordable, high-speed broadband service using C-band today and LEO in the future.

In the absence of Telesat's plan being implemented, we have strong concerns with the repercussions of connectivity in rural and remote areas and the financial and technical burden imposed on us absent the approval of Telesat's proposal.

We are pleased to submit this letter for your consideration in order to underline the criticality of broadband connectivity in our area and reiterate our support of Telesat's proposal and the promise of Telesat LEO to deliver high-speed low latency broadband connectivity to our communities in the future.

Thank you in advance for your consideration.

Sincerely,

Penny Carpenter

Director

Knet Services