

November 13, 2020

Innovation, Science and Economic Development Canada
235 Queen Street (6th Floor, East Tower)
Ottawa ON K1A0H5

Via email: ic.spectrumbauctions-encheresduspectre.ic@canada.ca

Re: *Canada Gazette*, Part I, September 12, 2020; 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

1. Pelmorex Weather Networks (Television) Inc. (“Pelmorex”) is the broadcasting licensee of the Canadian specialty services The Weather Network and MétéoMédia, Canada’s trusted sources for weather forecasts, news and emergency alerts. We are pleased to provide the following comments on the above-noted proceeding.
2. Specifically, Pelmorex is intervening in support of Telesat’s proposal for the 3800 MHz reallocation. Pelmorex relies on satellite distribution to deliver its The Weather Network and MétéoMédia signals to cable companies that are not fibre-accessible. We foresee the need to use satellite distribution for this purpose remaining in place for some time. Telesat’s proposal strikes the necessary balance of reallocating the spectrum needed for 5G deployment, while maintaining delivery of mission critical services to Canadians without interruption.
3. Without such a balanced approach to the reallocation Pelmorex and other broadcasters, and other services relying on satellite distribution, would have to seek alternative costly, and uncertain methods to ensure all Canadians receive equal access to important services, regardless of where they live. We therefore strongly recommend the Department adopt Telesat’s proposal.
4. We appreciate the opportunity to participate in this important consultation.

Yours truly,



Kurt Eby
Director: Regulatory, Government & Affiliate Relations
Pelmorex Weather Networks (Television) Inc.

