



Montreal, September 5th, 2017

(by email: ic.spectrumbauctions-encheresduspectre.ic@canada.ca)

Senior Director
Spectrum Licensing and Policy Branch
Innovation, Science and Economic Development Canada
235 Queen Street
6th floor, East Tower
Ottawa, Ontario
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RE: Additional Comments to Consultation on a Licensing Framework for Residual Spectrum Licences in the 700 MHz, 2500 MHz, 2300 MHz, PCS and 1670-1675 MHz Bands (Canada Gazette, Part I, Gazette Notice SLPB-003-17, posted on July 6, 2017)

Dear Sir / Madam,

1. After reviewing comments from interested parties on Consultation on a Licensing Framework for Residual Spectrum Licences in the 700 MHz, 2500 MHz, 2300 MHz, PCS and 1670-1675 MHz Bands, Ecotel Inc. ("Ecotel") is pleased to submit these additional comments to Canada's Minister of Innovation, Science and Economic Development.
2. Ecotel is very pleased to notice that other carriers like CCI Wireless, Airnet and BCBA voiced their concerns and ask ISED to allow smaller players have access to spectrum by reinforcing aggregation limit measures, by defining smaller tier areas for rural and remote areas and by adding rules that would give priority to smaller carriers in the auction process.
3. Ecotel's concerns were also specified in our first submission for this Consultation and go in the same direction. Without repeating all of them, and after taking note of all the submissions from interested parties to this Consultation, we reiterate the followings:
 - a. ISED must implement the right measures and conditions to ensure spectrum in rural and remote regions will be put in priority in the hands of smaller players that have the will to deploy in those areas before having Incumbents and 2008 New Entrants have access to it. Putting spectrum covering rural and

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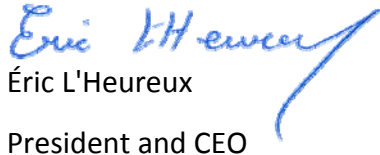
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remote regions in the hands of Incumbents and 2008 New Entrants will continue resulting in such areas not being served and spectrum that will remain unused.

- b. Ecotel is of the view that at minimum, smaller carriers should have a priority access to spectrum resources for rural and remote tier-4 areas in the residual spectrum auction and as such, interventionist measures are still required such as spectrum aggregation limits, spectrum set-aside for small carriers or any other measures that would give priority to smaller carriers.
4. Also, as per our first submission:
- a. Aggregation limits must be kept for 700 and 2500 bands.
 - b. Aggregation limits should also be defined for PCS or PCS spectrum should be set aside for new players that were not present during 2008 auctions.
 - c. Licenses should be auctioned on the basis of tier-4 areas.
 - d. Proposed opening bids must be reviewed to reflect auctioned licenses on the basis of tier-4 areas.
 - e. Opening bids must not be increased as suggested by some parties. This would increase entry barriers for smaller carriers.
 - f. We oppose to eliminating the mandatory roaming condition.
 - g. If ISED decides to keep proposed licenses on the basis of tier-2 and tier-3 areas (which would stop most smaller carriers including Ecotel from bidding in the upcoming auctions), deployment level conditions should be on the basis of tier-4 areas and measures should be added to allow smaller carriers to access spectrum that is not used including mandating spectrum subordination.

5. Ecotel thanks the Department for the opportunity to provide these additional comments.

Yours truly,


Éric L'Heureux
President and CEO

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