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Reply comments to: “Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Development”.

The following Reply Comments are provided after a Review of information provided by respondents, and follow-up interviews.

In spite of the promotional pitch that ISED submitted supporting TVWS over RRBS in the Consultation, there was only about 25% of respondents who supported that view. The remainder either had no comment, or supported RRBS.

The largest number of respondents had “no comment” when it came to TVWS vs RRBS. That suggests to us that those respondents either did not understand the significance of the choice, or did not care what happened in that case.

This led us to take the time to speak with a number of the respondents, and found that there was a substantial lack of knowledge about RRBS and its capabilities. Many did not know RRBS existed prior to the Consultation. So, we set out to inform them, and found out that, with a greater understanding, all of those contacted expressed a desire to support RRBS, or wanted to know more about this technology.

As examples, the Associations representing Counties and Municipalities were very interested in seeing what RRBS could do for their rural areas in its updated form, and requested further studies; while those representing indigenous nations were



anxious to have systems designed for their communities, along with quotations to present to their councils.

There has been overwhelming support from Indigenous Peoples in Canada. Sixty-one (61) First Nations across Canada expressed immediate support for RRBS; while the Chiefs of Ontario Leadership Council provided a Resolution in support of James Hobart's submission of support for RRBS. The Chiefs particularly see the benefit and affordability that RRBS can bring to their respective communities.

Of particular interest was the reaction when we contacted the Cree Nation, who want an immediate study done on the multiple communities that they represent in Northern Quebec. They expressed an interest in the versatility of RRBS to provide Multicasting as well as high-speed data. Multicasting would provide another dimension to their radio broadcasting distribution capability.

A great deal of interest was shown by the large number of Associations representing the Forest and Agriculture industries, who expressed the view that they had been lobbying for better rural connectivity for several years. They had no idea of the capability of RRBS, and would have supported RRBS if it had been available all those years. All the respondents we contacted wanted to see RRBS expanded and redeployed as quickly as possible.

Taken together, there is now a better understanding of the capabilities of RRBS in its upgraded form, and this has led to overwhelming support for the continuation, upgrade and utilization of RRBS.

In his comparison of TVWS and RRBS, Ian Grant, Managing Director of SeaBoard Group, points out in his submission, that a license is an essential component for a successful, sustainable WISP business, and that the flexibility, coverage increase, greater data rates and continuous R&D advantages of an updated RRBS system far outweigh those of TVWS.





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We agree with those views, and look forward to a similar realization by ISED, and an agreement to quickly upgrade the specifications for RRBS to allow for continuing use of unused UHF spectrum in rural areas of Canada.

Respectfully submitted,

Klakhani

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