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Re: Gazette Notice No. SLPB-004-21 – Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment

In accordance with the procedures set out in the above-noted consultation, please find attached the reply comments of Cogeco Communications Inc., on behalf of Cogeco Connexion Inc. ("Cogeco").

Cogeco thanks ISED for the opportunity to submit comments in this proceeding and remains available to answer any questions it may have regarding this submission.

Yours very truly,

[signed]

Leonard D. Eichel
Director, Regulatory Affairs, Telecommunications

c.c.: Paul Beaudry, VP Regulatory Affairs, Cogeco Inc.
Marie Ginette Lepage, VP, Wireless Services & Innovation, Cogeco Communications Inc.

Introduction

1. Cogeco Communications Inc. ("Cogeco") submits these reply comments on the proposal by Innovation, Science and Economic Development Canada ("ISED") to consult Canadians on supporting *'innovation and the availability of rural services through the proposed introduction of a new supplementary licensing process ("Access Licensing Framework, or ALF") for unused spectrum'*[1] (the "Consultation Document"). ISED's Consultation Document also includes proposals to streamline the subordinate licensing process as well as putting in place a framework to encourage the greater use of these licenses to augment the use of spectrum, improvements to white space rules and changes to the rural remote broadband system ("RRBS") policy framework.

2. As indicated in our comments on the Consultation Document, Cogeco broadly supports ISED's proposals on implementing additional measures to make unused spectrum available to other service providers in Canada. Cogeco has, on many occasions, argued that significant amounts of spectrum are lying fallow in Canada as a result of either deployment conditions which are not focused enough, or ambitious enough, in their implementation. Therefore, the proposed ALF is an important and positive step to make available scarce spectrum resources to other service providers to implement the provision of broadband services in rural and remote areas of Canada.

3. ISED recognizes that providing additional access to spectrum bands with '*(...) robust 4G and 5G equipment ecosystems can allow for wider provision of services, particularly in rural and remote areas*.'[2] As a result, ISED sought comment from interested parties on three areas:

a. A new licensing process, the ALF – this would supplement current licensing processes in a selected number of spectrum bands. The purpose behind the ALF is to improve access to spectrum in rural and remote areas by making available spectrum from existing licensees that would otherwise not be used;

b. New guidelines for subordinate licensing – these new guidelines would streamline regulatory approvals of subordinate licensing of spectrum in Canada, and

[1] Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment, ISED, SLPB-004-21, August, 2021, para. 1.
[2] Ibid, para. 17.

facilitate greater secondary market activity to shift spectrum from those who are not using it, to those who would; and

c. Updates to White Space and RRBS policy frameworks – these updates are designed to reflect recent developments and to clarify the use of the spectrum.

4. Cogeco's reply comments will address the support of ISED's proposals by a number of parties, as well as address certain key issues raised by other parties who objected to ISED's proposed ALF.

Support for the Proposed ALF

5. Cogeco would first like to note the considerable support from Canada's communications industry for ISED's proposals. A number of smaller, regional or niche wireless service providers demonstrated support for the proposed ALF. In addition, one of the national incumbent Mobile Network Operators (MNOs), Telus, also supported the proposed ALF, and recommended some additional changes to the framework in an attempt to better balance the existing obligations of primary license holders with those who aspire to obtain spectrum via the proposed ALF.

6. While the support for the proposed ALF is strong, many parties made suggestions on how to further refine the criteria under which the ALF would be used, namely:

a. Eligible Spectrum. Cogeco, along with many other parties to this consultation, have supported the idea to make any spectrum that is unused subject to the proposed ALF, rather than restricting its application to the PCS and Cellular bands.

b. Licensing areas. ISED proposed using Tier 5 license areas to award spectrum licenses under the proposed ALF. Cogeco supported this measure, as it was consistent with ensuring that spectrum is made available in areas in a more targeted manner, is more affordable for smaller, regional service providers and would provide additional incentives for service providers to deploy services. However, Cogeco also argued for flexibility in the use of Tier 5 license areas so that service providers could access unused spectrum within a Tier 5, but not necessarily be licensed over the entire Tier 5. A considerable number of parties argued for making unused spectrum available

through the use of either site licenses, or grid-cell licenses, particularly in larger geographic Tier 5 license areas considered to be Remote.

c. Existing deployment obligations. A number of parties - including those who opposed the proposed ALF – expressed concern about the effect of the use of the proposed ALF framework on any planned deployment commitments on spectrum that ISED has identified to be eligible for licensing.

7. In addition to these points, Telus made three recommendations on how to modify the framework for the proposed ALF that would take into account some of the concerns raised by parties:

> a. *'The policy should be applied to all bands in a renewal term (i.e., those bands where the initial licensing term has expired), not only to the PCS and Cellular Bands. For all other bands in their renewal term, the "use it or lose it" framework should be applied following their next upcoming general deployment requirement milestone;*
>
> b. *A variation of the policy ("use it or share it") should apply to bands that are still in the initial licensing term but are past their initial deployment requirement milestone; and*
>
> c. *The policy should not be applied only to rural and remote parts of the country, but to all service areas (metropolitan, urban, rural and remote) where spectrum remains unused.'*[3]

8. Given all the comments filed in support of the proposed ALF, Cogeco agrees with the principles that:

- flexibility should be built into the framework (either licences at the Tier 5 level, or, at the specific request of the applying service provider and use case proposed, site or grid-cell licensing);

- spectrum in bands other than just PCS and Cellular should be considered for the proposed ALF; and finally,

- Cogeco supports the proposed amendments of Telus, as they would largely address concerns raised by other primary license holders in this consultation around planned

[3] Telus Communications Inc., Comments for Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment, October 26, 2021, para. 5.

deployments in rural areas, and the obligations primary license holders must adhere to as part of the initial conditions of license when first receiving licensed spectrum.

Alternative Spectrum Resources

9. Cogeco notes in particular the comments of Bell Mobility Inc. ("Bell") and Rogers Communications Canada Inc. ("Rogers") on the subject of the proposed spectrum to be licensed with the proposed ALF.

10. In particular, Bell stated that the proposed ALF was unnecessary to achieve the policy objectives of the Government with respect to the availability of spectrum for rural and remote areas, as there are a number of spectrum policies recently adopted by ISED that are designed to specifically improve access to spectrum resources:

> *'For example, large portions of spectrum were set-aside for smaller wireless providers in the auctions for Advanced Wireless Services (AWS)-1 (43% of the spectrum available), AWS-3 (60% of the spectrum available), 600 MHz (44% of the spectrum available) and 3500 MHz (approximately 42% of the spectrum available). ISED also implemented spectrum caps in the 700 MHz and 2500 MHz auctions, and as part of fundamental reallocations of spectrum, required existing licensees to return a portion of their spectrum holdings for 2500 MHz (33% of existing holdings) and 3500* MHz *(between 20% and 70% of existing holdings) to enable more widespread licensing.'*
>
> *'Wireless service providers (WSPs) have access to a growing amount of Wireless Broadband System (WBS) spectrum that is available on an all-come, all-served basis such that all WSPs have equal access' (…)*
>
> *White space technology is also available. As noted in the Consultation, "since 2012, interest in white space technology from proponents of rural broadband has remained strong, " and "stakeholders have emphasized the favourable radio propagation characteristics including reach, penetration of foliage, and tolerance to hilly terrain, which make the spectrum particularly suitable for the delivery of broadband services in rural and remote areas of Canada. " In addition, "ISED expects that white space technology, in combination with other technologies such as 5 GHz and 6 GHz Wi-Fi, will increasingly be used to provide broadband coverage in rural and remote areas."'*[4]

[4] Comments of Bell Mobility Inc., Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment, 26 October 2021, paras. ES5-7.

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11. Rogers provided a similar assessment:

> *'(…) the Department has made significant amounts of spectrum available for licence exempt or lightly-licensed usage, e.g., 6 GHz band (including allowing higher power RLAN operations in 950 MHz of the total 1,200 MHz), expanded Wireless Broadband Services (WBS) in 3900-3980 MHz (80 MHz), High Power Outdoor Devices (100 MHz), 64-71 GHz (adjacent to 57-64 GHz, providing **14 GHz** of contiguous licence-exempt spectrum) etc. Further, the Television White Spaces (TVWS) decision has made available significant amounts of low-band spectrum available for rural networks. The Department is also looking at ways to enhance usage of the 900 MHz LMR band for private network deployments, and our initial analysis of the Department's Spectrum Management System (SMS) database shows little current usage in rural and remote Tier 5 areas."*[5]

12. In response, Cogeco would state that, while both Rogers and Bell are correct in identifying a number of initiatives recently promoted by ISED to liberate unused spectrum resources, much of the spectrum they identify is either insufficient, or unsuited for broadband use.

13. Much of the spectrum they point to is higher up in the spectrum band (greater than 5 GHz), which will mean more equipment will have to be deployed closer to individual customers by potential service providers to offer a service compared to other networks using spectrum lower down in the band as in other parts of Canada. Further, Rogers' statement that 14 GHz of contiguous license-exempt spectrum in the 64-71 GHz band has been made available for licence-exempt use is frankly fanciful, given the unknown deployment challenges in using such spectrum (short distance propagation characteristics and need for direct line-of-sight, amongst others), and the paucity of available equipment available to offer a broadband service in this band.

14. It should be noted that ISED itself made many of the same observations with respect to the different spectrum bands, and different spectrum sharing arrangements, they have implemented over the past few years (see, for example, section 5 of the Consultation Document). Despite these initiatives, ISED still considers it appropriate to move ahead with their proposed ALF, as it provides them with another useful tool to make more spectrum available across different bands, thereby fulfilling the policy

[5] Comments of Rogers Communications Canada Inc., Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment, October 26, 2021, para. 46.

objective of ensuring that spectrum is utilized, and further, providing a wide variety of spectrum at different frequency bands for service providers.

15. Finally, while it is true that ISED did make available a substantial amount of spectrum for license-exempt use in the 6 GHz band, much of this is unsuitable to offer a stable, high performing broadband service on a stand-alone basis. This spectrum is more suitable to augment the services offered through the use of other spectrum lower in the spectrum band, rather than to offer a stand-alone broadband service. The interference, power and equipment restrictions for this band alone – in addition to the license exempt status of this spectrum, which makes it susceptible to interference over time as more service providers take advantage of its use - make it a significant challenge to do what Rogers proposes: offer a carrier-grade broadband service covering a wide geographic area.

16. As Rogers has stated: '*Spectrum is the lifeblood of wireless networks, and access to* ***exclusive, interference-free*** *spectrum is necessary for facilities-based operators to continue increasing coverage and capacity to benefit Canadians'* [emphasis added].[6] If this is true for incumbents, it should be true for every wireless service provider in the country. Incumbents should not get to hold a monopoly on the best spectrum available by virtue of their size or market power or historical position in the Canadian wireless service market.

<u>'Expropriation' of Spectrum & Interruption of Deployment Plans</u>

17. A number of the parties who are opposed to the proposed ALF have made arguments that what ISED is proposing amounts to an 'expropriation' of spectrum by ISED.

18. For example, Bell stated:

> *'ISED's proposed Access Licensing Framework seeks to expropriate a portion of an existing licensee's spectrum licence without any warning even though existing licensees have met, and continue to meet, their conditions of licence. We are not aware of any precedent for making such a change when a licensee is compliant with their conditions of licence.'*[7]

6 Ibid, para. 2.

7 Ibid, para. ES8.

19. Further, Rogers also stated:

> *'The proposed Access Licensing regime has several significant drawbacks, particularly the consultation's proposal to make exclusively-licensed spectrum available (paid for at great expense by network operators like Rogers) to other interested carriers, as it may actually impede our ability to deploy new services in rural regions. By proposing new access rights to begin in such a short timeframe (possibly as short as 3 months), operators like Rogers could be left unable to deploy in many regions of the country as our spectrum may now be impaired by another carrier."*[8]

20. Finally, Sasktel also stated that such a proposal was completely unacceptable, and made similar arguments to Bell concerning expropriation:

> *'The proposed scheme is not an amendment of a license condition, it is a fundamental alteration of the license currently held by parties who pay for the privilege to hold it. ISED repossessing and allocating spectrum previously licensed would constitute a breach of the license already issued to current holders, increase the complexity of networks, and increase the cost of offering services while preventing parties like SaskTel from continuing to push service further out into rural areas as we do each year.*[9]'

21. In response, Cogeco would submit that there cannot be any 'expropriation' in the true sense of the word. Spectrum is a public good, and is licensed by ISED for use by parties in accordance with established spectrum policies, relevant legislation and conditions of license.

22. As ISED itself has stated in various policy and regulatory documents pertaining to the allocation of spectrum in Canada:

> '*The Minister is guided by the policy objectives of the Telecommunications Act, and the Spectrum Policy Framework for Canada (SPFC), which seeks to maximize the economic and social benefits that Canadians derive from the use of the radio frequency spectrum resource.*'[10]

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[8] Ibid, para. ES3

[9] SaskTel Comments, Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment, October 26, 2021, para. 2.

[10] ISED, Spectrum Outlook 2018 to 2022, Section 3, para. 7.

> *'Industry Canada issues spectrum licences to authorize the use of a specific frequency/frequencies or a frequency block(s) within a defined geographic area(s) under certain minimal conditions.'*[11]

23. The Minister of ISED has wide discretion under the Radiocommunications Act to license spectrum as he or she sees fit, given that spectrum is considered a 'public good' and further, is a scarce resource that requires coordination – through the use of various allocation strategies – at the national and global level. If ISED feels that certain primary license holders are not respecting their obligations, or, that the need for spectrum has changed due to certain environmental factors (such as a pandemic, that necessitates a reorganization of work where reliable, high speed connectivity is a critical part), then the Minister has the discretion to do so.

24. That being said, Cogeco is fully aware that coordination should not imply proceeding in a cavalier manner. ISED's proposed ALF is a balanced approach to addressing the connectivity concerns of Canadians in rural and remote areas, while at the same time, respecting the rights of existing license holders.

25. As for the issue of deployment plans currently in motion by license holders, it may very well be true that plans are being made to use these spectrum resources.

26. However, when spectrum has been fallow for such long periods of time, it raises legitimate questions as to the sincerity of the license holder in this regard. The business case for incumbent wireless service providers rests largely on being able to roll out network assets in areas with the greatest population density, in order to begin the process of generating a positive return on their investment. Rural and remote areas, because of their low density, are lower on the priority list for development and, as we've seen, certain areas may never see any network investment at all.

27. Incumbent MNOs have more than made their investment back through the extensive networks they have deployed (Bell states 99% coverage, and rural coverage of LTE of 97.4%; Rogers states 97% coverage), and have deliberately chosen not to deploy networks in many rural and remote areas for decades. It is more than time that some of this spectrum be redeployed to service providers who have a greater interest in serving the customers in these areas.

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[11] ISED, CPC-2-1-23 — Licensing Procedure for Spectrum Licences for Terrestrial Services, sect. 4.

Timeline of Applicability of the Proposed ALF

28. In its Consultation Document, ISED is proposing to implement the proposed ALF starting 3 months after a final decision is made by them in this consultation.

29. While the underlying rationale on the part of ISED is to make spectrum available quickly, some concerns have been raised about this timeline from a number of parties.

30. In particular, Bell stated that:

> *'It is completely inappropriate for ISED to begin access spectrum licensing three months after the publication of a decision on the Consultation.'*[12]

'Existing licensees would need significantly more than three months to adjust to ISED's proposed new Access Licensing Framework. We are unaware of any instance in which ISED imposed a new spectrum deployment requirement that had to be met in less than five years. As a result, we recommend that at a minimum, access spectrum licensing should not occur until five years after the publication of the decision.'[13]

31. Rogers also makes a number of points with regard to the proposed timeline that ISED proposes to make such licenses available:

> *'(…) the proposal to begin access licensing three months after the publication of the decision would lead to a number of poor wireless policy outcomes.'*

> *'(…) however, at a minimum, the Department should not impose any access regime for five years in order to allow primary licence holders an opportunity to build out to the new requirements.'*[14]

32. In response, Cogeco understands that larger, wireless service providers have extensive networks that implicate considerable effort for any transition process subsequent to change in a particular use of existing spectrum. Additionally, Cogeco also understands that wireless service providers – in responding to the demand for better connectivity services in areas where services do not currently exist, or where they are inferior to the service level objective of 50/10 Mbps – may have advanced

12 Ibid, para. 54.
13 Ibid, para. 56.
14 Ibid, para. 168.

plans in place to deploy network assets to improve or introduce services for the first time.

33. However, Cogeco submits that asking for a minimum five-year period to make such spectrum available after ISED finalizes its framework for the proposed ALF is unreasonable. The need to connect certain rural and remote areas is urgent, particularly with how work location has turned on its head due to the pandemic, and the increasing plethora of services that are being offered online.

34. As such, Cogeco would recommend a timeline that is more reasonable, such as 18-24 months from the date of a decision by ISED in this consultation. This modified timeline should provide the necessary time for not only incumbent carriers to accelerate and finalize their existing deployment plans, but also, provide a near-term window of opportunity for other service providers to prepare the necessary groundwork to deploy in areas identified by ISED as part of their final ALF framework.

Spectrum Subordination Framework

35. As part of their consultation on the ALF, ISED also made a number of proposals regarding the existing subordination framework. In particular, ISED noted they are acknowledging that the existing framework is seen by some as a barrier to enter into subordination arrangements, and as a result, ISED is seeking to reduce the administrative burden and uncertainty with the existing process as much as possible.

36. In particular, ISED's proposals are focused on changes to the application process and changes that could streamline the consideration of subordinate licence requests.

37. Most parties supported ISED's proposals regarding improvements to the subordination framework.

38. For example, Bell noted that:

> '*We agree with the Consultation's statement that "subordinate spectrum licensing, as one facet of the secondary market, is an effective means of facilitating access to spectrum resources for those who wish to use it.*"'
>
> Further, Bell also stated that:

'*However, process improvements can be made with respect to the length of time required to approve subordination applications, especially for those related to private broadband networks and IoT applications. The development of these new and innovative services should not be hindered by long subordination application approval timelines.*'[15]

39. In a similar vein, Rogers is an avid supporter of the subordination process. They stated: '*Rogers fully supports the Department's goal to increase rural broadband access and accommodating new innovative network usage through spectrum subordination.*'[16] Rogers also noted the many subordination agreements they had entered into in the past few years that had successfully made spectrum available to service providers serving rural and remote constituencies, as well as to a number of indigenous nations.

40. However, Rogers also states that:

'(…) in order to allow primary licensees to ensure their current and planned network deployments – both rural public network expansion and remote private network builds – are protected from interference, subordination should remain voluntary and on a commercially-negotiated basis. Any mandatory subordination or Access Licensing regime that does not account for a primary licensee's build plans and business opportunities will result in the appropriation of spectrum rights that primary licensees have acquired significant and ongoing prices.'[17]

41. Rogers does not suggest any particular manner in which ISED can improve the current subordination framework, but is generally supportive of any changes that streamline the current application and approval processes.

42. Finally, Rogers also makes a point around the issue of network partners subordinating spectrum to each other, post-auction. Specifically, Rogers is raising the issue of Bell and Telus working cooperatively in certain markets to subordinate spectrum to each other, thereby allowing each carrier to acquire spectrum resources that they could not otherwise during an auction.

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[15] Ibid, paras. 70 and 72.

[16] Ibid, para. 209

[17] Ibid, para. 209

43. As indicated in our comments, Cogeco supports any measure by which ISED can streamline the current application and approval processes. Most parties that filed comments in response to this consultation, including the national incumbents, support the subordination framework, and changes by ISED to improve overall efficiency and responsiveness.

44. In addition, as Cogeco noted in its comments, ISED can ensure that, for all parties receiving a request to subordinate spectrum, a time limit of a maximum of 90 days should be imposed on that party to provide a response to the requesting party. Second, Cogeco also recommended that ISED should modify its reporting requirements to ensure that it receives data from spectrum holders on the number of subordination requests received, successfully entered into and those that were not successful (and the reason) in a manner similar as is done with tower sharing requests.

45. Cogeco does not see anything in the comments submitted that would contradict these points, and as such would continue to recommend these actions as part of ISED's changes to the existing subordination framework.

46. Finally, Cogeco takes note of Rogers' concerns around reciprocal subordination on the part of Bell and Telus. Cogeco submits that allowing two large, dominant incumbents to, in effect, 'circumvent' the rules around the acquisition of spectrum during an auction, should not be permitted and agrees with Rogers that ISED take action in this regard as part of its changes to the existing subordination framework.

Set-Aside Policy

47. Even though it was not part of the scope of this consultation, the national incumbent MNO's saw fit to use this opportunity to again criticize ISED's use of pro-competitive measures to enable smaller, regional wireless service providers in acquiring spectrum during an auction process.

48. For example, Rogers stated:

> *'While Rogers is supportive of competitive auctioning of spectrum to ensure that it is awarded to those who value it the most, the high costs, particularly for national operators, reduce the amount of capital that is available for network coverage and capacity expansion. This situation is entirely artificial and need*

> *not exist.* ***It is the direct result of the Department's set-aside policy*** [emphasis added].*'*[18]

49. Rogers goes on to state that spectrum set-asides confer unfair subsidies on some of Canada's largest communications companies; that set-asides drive up the cost of open spectrum in an auction; and that higher spectrum costs overall lead to lower network investment.

50. Telus as well commented the 'pernicious' effects of spectrum set-asides:

> *'Unfortunately, it is ISED's set-aside spectrum auction policy that counteracts the goal of rural broadband connectivity. Most of the spectrum that sits unused in areas where it could benefit Canadians came about as a consequence of using set-asides at auction to sequester a quarter of the country's mobile capacity for regional competitors and then mandating weak deployment requirements. When the government subsidizes a scarce resource that holds significant intrinsic value and allocates it across large geographic areas that span urban, rural and remote regions without imposing strong and timely deployment requirements, spectrum ends up in the hands of carriers that either cannot or choose not to deploy it.'*

51. Cogeco submits these kinds of statements are not only out of scope in the context of the current consultation, but also, make manifest the proverbial idiom of the 'pot calling the kettle black'.

52. As Cogeco pointed out two years ago to ISED, incumbent carriers themselves do not have a perfect record in the deployment of their spectrum resources in rural and remote areas. There is considerable spectrum that has not been deployed, particularly at a Tier 5 service area level, in many markets across the country. ISED itself, in analyzing the potential number of spectrum licenses its proposed ALF would affect, concluded a preliminary analysis that indicated the following blocks without any deployments at a Tier 5 level:

- 101 spectrum blocks in the 800 MHz A & B bands; and
- 2,194 spectrum blocks in the PCS band (A through F blocks).

[18] Ibid, para. 42.

53. Almost the entirety of the 800 MHz and the PCS band spectrum are held by incumbents, not new entrants. Therefore, for Rogers and Telus to accuse new entrants – as the recipient of spectrum via ISED's set-aside policies in different auctions over the past decade – as the primary actors in Canada who are not developing spectrum resources in rural and remote areas, is patently false.

54. As a result, ISED should ignore these arguments in their entirety, given that they are out of scope with regard to the issues being considered in this consultation, and that the evidence presented by both Rogers and Telus in this regard is unsubstantiated and irrelevant for ISED to make a decision regarding the implementation of the proposed ALF, a revised subordination policy or the availability of white space spectrum for broadband used.

55. Cogeco continues to strongly support pro-competitive measures. Cogeco believes that the full array of pro-competitive measures continues to be required in the Canadian market context due to the market power of the three national incumbents, their dominance in their possession of spectrum licenses for almost all low, mid and high-band licensed spectrum in Canada and the implementation of the pending MVNO policy of the CRTC.

Conclusion

56. Cogeco applauds ISED for their proposals in this Consultation. Given the sheer number of prospective spectrum blocks identified by ISED that could be made available through the proposed ALF, the decision to use a First-Come, First-Served licensing process, a relatively short license term and ambitious deployment conditions are all positive steps to releasing a significant amount of spectrum resources that service providers in rural and remote areas will surely welcome.

57. With the amendments proposed by Cogeco – licensing spectrum in areas smaller than a Tier 5, broadening the eligible spectrum available for ALF licensing, addressing unserved, or underserved, areas in Metro and Urban Tier 5 service areas on a case-by-case basis, by permitting subordination and transfers of licenses awarded using the proposed ALF and that licenses awarded using the proposed ALF be subject to ISEDs standard reporting requirements, as well as accommodating a longer period before beginning the proposed ALF process and taking into account some of the recommendations proposed by Telus – ISED will have in hand an elegant and coherent method to re-allocate unused spectrum in rural and remote areas of Canada.

58. Cogeco thanks ISED for the opportunity to participate in this Consultation.

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