



16 March 2018

By Electronic Mail

Director, Spectrum Regulatory Best Practices
Innovation, Science and
Economic Development Canada
235 Queen Street
Ottawa, Ontario
K1A 0H5

Email: ic.spectrumbauctions-encheresdusprecture.ic@canada.ca

To whom it may concern:

Subject: Canada Gazette Notice No. SLPB-006-17 - Consultation on the
Spectrum Outlook 2018-2022

1. Pursuant to the procedures established by Innovation, Science and Economic Development Canada (“ISED”) in *Canada Gazette* Notice No. SLPB-006-17 - *Consultation on the Spectrum Outlook 2018-2022*, which was published on 21 October 2017 (“the consultation document”), as modified by *Canada Gazette* Notice SLPB-010-17 – *Extension to the comment period: Consultation on the Spectrum Outlook 2018-2022*, which was published on 30 December 2017, the Canadian Cable Systems Alliance and the Independent Telecommunications Providers Association (collectively “the Associations”) hereby submit their reply comments in this proceeding.

2. Collectively the Associations represent more than 110 small telecommunications and broadcasting service providers from across rural and remote Canada. These service providers offer high quality voice, Internet access and broadcasting services to their customers.

3. At paragraph 14 of its comments Bell Mobility Inc. (“Mobility”) states:

We recommend that the Department reject calls to use licence areas more granular than Tier 4, and we generally support licensing on a Tier 1 to Tier 3 basis. The current approach has successfully allowed wireless carriers to extend high quality service to more than 99% of all Canadians. It also allows market forces to govern network rollouts and investments while facilitating deployment and minimizing co-ordination requirements with other operators.

4. Mobility’s statement is indicative of the views of the largest wireless carriers in Canada that have benefitted from the status quo. They are not, however, indicative of the views of the many smaller industry players in Canada, including the more than 110 small service providers represented by the Associations.

5. In their initial comments in this process the Associations raised the following issues from a small service providers perspective:

- Tier sizes;
- A “Use it or lose it” condition of licence
- International Coordination; and
- A Spectrum Rental Model.

5. The Associations note that the following parties have filed comments on the record of this proceeding that contain many of the same views as those filed by the Associations.

- British Columbia Broadband Association
- CanWISP
- Cogeco Communications;
- Eastern Ontario Wardens’ Caucus/Eastern Ontario Regional Network

- Sogetel Mobilité

6. The Associations do not agree with all of the views expressed by these parties. However, where there is agreement the Associations generally recommend these comments to ISED as evidence of widespread industry support for changes that are needed to facilitate the involvement of small service providers in the wireless market in Canada. These changes would contribute to the achievement of ISED's key goal of maximizing use of scarce spectrum resources in Canada.

Yours truly,



Jonathan L. Holmes
Executive Director
ITPA



Christopher J. Edwards
VP Corporate & Regulatory Affairs
CCSA

*** End of Document ***