



## **Reply Comments for:**

### **Consultation on a Policy and Licensing Framework for Spectrum in the 3800 MHz Band**

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## INTRODUCTION

1. Founded in 1892 and headquartered in Nicolet QC, Sogetel Inc. ("Sogetel") is a facilities-based telecommunications service provider which has been investing in its infrastructure for over a century and continues to do so: by the end of 2022, the company will have deployed around 10,000 kilometers of fibre optic cables in various regions of rural Quebec.
2. Sogetel provides telephony, high-speed Internet and television services to its subscribers, in addition to offering its business customers advanced services (connectivity and dark fibre). Sogetel Mobilité Inc. ("Sogetel Mobilité") offers mobile telephone services in rural areas and operates about 30 cell sites. Sogetel and Sogetel Mobilité together have over 300 employees.
3. The company is committed to continuing to grow its business and expand its services, including its mobility segment.
4. Sogetel, on behalf of itself and its affiliate Sogetel Mobilité Inc., is hereby submitting its reply comments to ISED's Consultation on a Policy and Licensing Framework for Spectrum in the 3800 MHz Band. In the following sections we will be focusing on the filings of selected stakeholders.

## SOGETEL'S REPLY COMMENTS ON SELECTED STAKEHOLDERS' FILINGS

### Coexistence with aeronautical radionavigation systems

*Q1. ISED is seeking comments on its proposal to extend the mitigation measures described in SRSP-520 to protect radio altimeters from flexible use operations in the 3500 MHz band to flexible use operations in the 3800 MHz band (3650-3900 MHz). This extension is proposed until domestic and international studies are completed.*

5. Sogetel agreed with ISED that the safety of Canadians was paramount but also expressed the view that it would have been more administratively efficient for ISED to lower the maximum permissible spurious emission limit defined in RSS-192 rather than to impose restrictions on antenna up tilt and define exclusion zones as it did in section 10.3 of SRSP-520.
6. However, subject to (i) ISED's Commitment in the Consultation Document to continue to monitor the evolution of the situation while international and domestic studies continue, (ii) the temporary nature of the measures adopted, and (iii) the similar nature of the 3500 and 3800 MHz bands, Sogetel supported ISED's proposal to extend the mitigation measures described in SRSP-520 to protect radio altimeters from flexible use operations in the 3500 MHz band to flexible use operations in the 3800 MHz band.



7. Sogetel notes however that the question has generated a lot of comments from stakeholders, with some parties such as Rogers, Quebecor or TELUS adopting an approach compatible with Sogetel's, i.e. asking the Department to complete its review and studies, and to ensure that restrictions are evidence-based and time-limited, if required at all.
8. Other stakeholders, such as Bell Mobility, SaskTel and the CWTA, strongly opposed the measures, citing numerous international reports and highlighting that other international jurisdictions where the band has been deployed have no reported cases of interference with altimeters. They reject the extension of the 3500 MHz mitigation measures to the 3800 MHz band. Bell Mobility suggested that the aviation industry should bear the cost of updating altimeters if and as required, and SaskTel claimed that the auction should be delayed until this issue is resolved because the uncertainty around deployment restrictions prevents potential bidders from properly assessing the value of the 3800 MHz spectrum.
9. In Sogetel's opinion, the most sensible and practical response came from Iristel. The fact that ISED is committed to continuing to monitor the evolution of the situation while international and domestic studies continue, and the fact that existing users of the 3800 MHz band will have until 2025 to vacate the band, lead to the conclusion that the extension of the 3500 MHz mitigation measures to the 3800 MHz band to protect altimeters is not required, because with proper ISED commitment and diligence the situation should be resolved long before 3800 MHz spectrum is available for the deployment of 5G systems.

## Licence areas

*Q3. ISED is seeking comments on its proposal to use Tier 4 service areas for the 3800 MHz licensing process.*

10. Sogetel notes that most stakeholders supported the use of Tier 4 service areas for the 3800 MHz licensing process. Even Rogers, which normally advocates for the use of larger service areas, recognized that it makes administrative sense to opt for a tier size consistent with the one used for the 3500 MHz licensing process.
11. Cogeco and CanWISP advocated for the use of Tier 5 service areas for the 3800 MHz licensing process – Cogeco only in the three metro areas and CanWISP throughout the country. Sogetel recognizes that CanWISP's proposal to use Tier 5 service areas would foster the acquisition of spectrum by smaller entities.
12. Consequently, Sogetel supports ISED's proposal to use Tier 4 service areas for the 3800 MHz licensing process but would also be comfortable with the use of Tier 5 service areas if ISED were to grant CanWISP's request.



## Pro-competitive measures

*Q4. ISED is seeking comments on its proposal to implement pro-competitive measures in the 3800 MHz auction.*

13. Sogetel notes that only Bell Mobility and Rogers opposed pro-competitive measures. All other service providers – including TELUS and SaskTel – supported ISED’s proposal to implement pro-competitive measures.
14. Sogetel submits that pro-competitive measures do not always guarantee lower spectrum prices for the intended beneficiaries. SaskTel paid 44 times the reserve price for its 3500 MHz spectrum, despite being set-aside eligible in the 3500 MHz auction.
15. Sogetel also notes that pro-competitive measures need to be targeted at addressing the imbalances in the competitive market, particularly the challenges faced by smaller players.
16. Thus, TELUS’s claim that it too needs pro-competitive measures to help compensate for the market distortion created by the 3500 MHz Inukshuk spectrum transition – referred to by TELUS as “asymmetry in pre-auction NMSP holdings” – should not be given credence.
17. Sogetel believes that the broad industry support for pro-competitive measures, including that of two entities found by the CRTC to exercise market power in the provision of retail mobile wireless services<sup>1</sup>, adds weight to the arguments presented by Sogetel in the comment phase of this Consultation. Specifically, Sogetel argued for the need for alignment of pro-competitive measures with ISED policy objectives as evidenced in the success of previous spectrum licensing processes.
18. Sogetel submits that the evidence shows that pro-competitive measures are required and urges ISED to follow through with its proposal and ensure they are implemented for the 3800 MHz auction.

### ***If pro-competitive measures are to be implemented***

*Q5. If adopted, ISED is seeking comments on three proposals for pro-competitive measures in the 3800 MHz auction. Three options are proposed:*

- *Option 1: a 50 MHz set-aside*
- *Option 2: a 100 MHz cross-band cap across the 3500 MHz and 3800 MHz bands or*
- *Option 3: a 50 MHz set-aside and 100 MHz cross-band cap across the 3500 MHz and 3800 MHz bands*

*Q6. ISED is seeking comments on alternative options for pro-competitive measures for the 3800 MHz auction.*

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<sup>1</sup> <https://crtc.gc.ca/eng/archive/2021/2021-130.htm>, Review of mobile wireless services section.



19. Sogetel favored Option 3 among the three options proposed by ISED but argued that based on the proportion of spectrum set-aside from past auctions and the needs of regional and smaller service providers, 50 MHz of set-aside spectrum was insufficient. Sogetel therefore proposed a fourth option, where the set-aside would be increased to ten blocks rather than five, and showed that this approach would be more consistent with past auctions where a set-aside was used.
20. Sogetel notes that Quebecor, Eastlink and TerreStar also made similar requests to increase the amount of set-aside spectrum available in the auction, recognizing that ISED's set-aside proposal deviates from past policies and licensing frameworks.
21. Iristel also proposed that the set-aside be increased to 100 MHz in rural areas, along with a reduction of the spectrum cap to 80 MHz for those same service areas. ECOTEL expressed a similar view to that of Iristel but with a 60 MHz set-aside rather than a 100 MHz set-aside.
22. Cogeco supported ISED's Option 3, but Sogetel has no doubt that its proposed Option 4 would equally benefit the service provider.
23. SaskTel opposed the implementation of a cross-band spectrum cap and instead supported Option 1, where a 50 MHz set-aside would be implemented. It is worth noting that SaskTel already owns at least five 3500 MHz blocks across all service areas of Saskatchewan and holds in excess of ten blocks in two of these service areas. One could hardly support a cross-band cap in these circumstances.
24. Sogetel submits that there is clear support among stakeholders who have in the past qualified as set-aside eligible bidders and would likely do so in the 3800 MHz auction if they chose to participate. Sogetel further submits that the set-aside proposed by ISED deviates from past auctions in terms of the proportion of spectrum beyond the reach of NMSPs.<sup>2</sup> Making available significant spectrum to set-aside eligible players is crucial to building a competitive landscape for Canadian consumers – a policy objective of the federal government since 2008.
25. Sogetel argues that now is not the time, when the CRTC is about to approve mobile wholesale tariffs as part of an innovative facilities-based MVNO regime, for ISED to hobble regional providers in accessing 3800 MHz spectrum.
26. CanWISP made interesting proposals: first, to create a set-aside within the set-aside for rural service areas and second, to increase the number of set-aside blocks to 16 in those rural service areas, of which eight would not be available to large regional service providers (Freedom, SaskTel, Xplore Mobile, Videotron and Eastlink). CanWISP also proposed lowering the cross-band cap to 80 MHz in rural areas and increasing the set-aside to 80 MHz in urban service areas. Sogetel understood that CanWISP's definition of 'rural' included remote service areas and its definition of 'urban' included metro service areas.

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<sup>2</sup> National Mobile Service Providers, i.e. Bell Mobility, Rogers and TELUS, in accordance with ISED's terminology.



27. Sogetel believes this proposal is worth consideration. It would be reasonable to assume that NMSPs' 3800 MHz spectrum needs for their 5G mobile systems will mostly be in urban and metro areas given the propagation characteristics of the band. WISPs and small service providers, on the other hand, need spectrum in rural settings to provide broadband accessibility using FWA or mobile systems in small towns. The solution proposed by CanWISP would allow NMSPs to acquire spectrum in urban and metro areas, as 17 spectrum blocks would be available to them in those service areas. Regional MSPs would have access to eight set-aside blocks in their area of eligibility and WISPs and small service providers would be able – perhaps for the first time in the Canadian history – to afford the spectrum they need to connect rural Canadians.
28. Sogetel submits that if ISED is serious about its rural policy objective, then CanWISP's proposal deserves consideration. Sogetel would certainly be in favor if ISED decided to implement CanWISP's proposal.
29. Sogetel submits that the pro-competitive measure requested by TELUS – an attempt to bridge the spectrum-holding imbalance among NMSPs, where ISED would only implement a cross-band cap – must be rejected. TELUS supported ISED's Option 2 or the implementation of a 100 MHz cross-band cap across the 3500 MHz and 3800 MHz bands and proposed that the cap be increased to 110 MHz.
30. Sogetel already demonstrated, in its submission filed during the comment phase of this Consultation process, that a cross-band cap alone would be insufficient to ensure that regional and smaller service providers have access to 3800 MHz spectrum. Sogetel demonstrated that the adoption of a 100 MHz cross-band cap as a stand-alone measure would enable smaller regional carriers to secure four blocks or less in 92 of the 172 service areas and no spectrum at all in five service areas.
31. Sogetel submits that in the scenario where the spectrum cap is to be increased to 110 MHz – as per TELUS's proposal – and the NMSPs acquire all the spectrum available to them, regional service providers would have access to only three blocks of spectrum or less in 114 of the 172 Tier 4 service areas, and no spectrum at all in 24 service areas. Sogetel is puzzled by the fact that TELUS has proposed a pro-competitive measure that does so little to enable spectrum access for smaller players, and urges ISED to reject TELUS's proposal.
32. Sogetel therefore reiterates that a cross-band spectrum cap alone is not sufficient to ensure the availability of sufficient spectrum for regional carriers. Although the prospect of a cross-band spectrum cap is attractive from the perspective of fair asset distribution, only by adding a set-aside measure would ISED be able to ensure sufficient 3800 MHz spectrum availability for regional carriers in every service area.
33. Sogetel therefore submits that its proposed Option 4 – where a 100 MHz set-aside is combined with a 100 MHz cross-band cap across the 3500 MHz and 3800 MHz bands – is the most suitable pro-competitive measure and the most widely supported by the industry. Alternatively, Sogetel would support the implementation of CanWISP's proposal, as Sogetel believes it



would demonstrate ISED's will to implement pro-competitive measures tailored to its policy objectives.

***If a set-aside is to be applied***

*Q7. ISED is seeking comments on its proposal to limit the eligibility to bid on set-aside licences to those registered with the CRTC as facilities-based providers that are not NMSPs, and that are actively providing commercial telecommunications services to the general public in the relevant Tier 2 service area of interest, effective as of the date of application to participate in the 3800 MHz auction. If not supporting ISED's proposal, provide alternate eligibility criteria.*

34. Sogetel notes that Bell Mobility, despite being strongly opposed to the set-aside, proposes a series of modifications to the set-aside eligibility rules, including that eligible entities be providing services in the relevant Tier 4 area rather than the relevant Tier 2 area, that they be registered as wireless service providers with the CRTC, that they already hold spectrum assets, that service to wholesale customers be excluded from eligible services, that a clearer definition of 'actively providing commercial telecommunication services' be provided and that the term 'general public' be redefined.
35. TELUS on the other hand states at paragraph 55 of its submission that set-aside eligibility should be granted at the Tier 1 level to increase competition in the set-aside, but argues the opposite in the next paragraph where it claims that eligibility to bid on set-aside spectrum should be limited to those that already have a track record of investing in a network in the area it is bidding.
36. Rogers proposes that the Department designate any set-aside eligible bidder as a facilities-based operator currently serving the local market with actual facilities, so that 'over-the-top' services be excluded, a measure that is expressly targeted at preventing Videotron's Fibreoptic subsidiary from acquiring set-aside eligibility outside of the company's Quebec footprint.<sup>3</sup>
37. Sogetel submits that ultimately, as the set-aside eligibility criteria's primary goal is to exclude the NMSPs from acquiring the entirety of the available spectrum, they will never be eligible for the set-aside themselves. Sogetel sees their attempt to propose modifications to the set-aside eligibility criteria as another attempt to influence or control the market. Sogetel therefore submits that ISED should disregard the NMSPs' comments when it comes to defining its set-aside eligibility criteria and implement criteria that it believes will increase its chances of fulfilling its policy objectives.
38. Sogetel notes that Eastlink requested that set-aside eligibility be restricted to mobile or FWA service providers, while Cogeco requested that the eligible entity should be providing services in the Tier 4 area of interest rather than Tier 2, and Xplornet has argued for excluding SaskTel from the set-aside, citing the CRTC's assessment that it exercises market power in Saskatchewan. Sogetel submits that these proposals are basically aimed at reducing the level

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<sup>3</sup> Rogers submission, para. 151





of competition in the set-aside, without any real evidence that they support ISED's policy objective. Xplornet's argument comes closer on that front, but the evidence shows that SaskTel, despite being eligible for the set-aside, paid on average 44 times the opening price for its spectrum, a ratio over twice as high as what NMSPs paid. One could argue that SaskTel's assumed value of the spectrum drove its bid strategy rather than its set-aside eligibility.

39. Iristel requested that one-way satellite services be excluded, and SaskTel requested measures to prevent set-aside eligible speculators from transferring spectrum to non-set-aside eligible entities in the first five years of the licence term. It was Sogetel's understanding that these measures were already in place. In the past, ISED excluded services governed by the *Broadcasting Act* for the set-aside eligibility of the 3500 MHz auction, thus preventing Shaw's national set-aside eligibility. Sogetel now realizes that this provision has been dropped from the proposed set-aside eligibility criteria for the 3800 MHz auction. Therefore Sogetel agrees with Iristel that the criteria should be maintained. It is Sogetel's understanding that SaskTel's concern is unfounded as exceptions that allow a set-aside eligible entity to transfer spectrum to a non-set-aside eligible entity would prevent set-aside eligible speculators from transferring spectrum to an NMSP. However, Sogetel still agrees with SaskTel that the requirement is valid.
40. Quebecor and ECOTEL supported ISED's proposed eligibility criteria. If we overlook the fact that SaskTel requested a modification to the criteria that it already supported, then it could be said that it also supported ISED's proposal.
41. Sogetel submits that, subject to the changes requested by CanWISP and Iristel, ISED's set-aside eligibility criteria should be adopted as stated. Other stakeholders have requested changes in order to either derail or lower competition within the set-aside for their own interests. Sogetel submits they have not demonstrated that their proposed changes would help further ISED's policy objectives.
42. Sogetel therefore supports ISED's proposal, with the modifications requested by CanWISP and Iristel.

***If a cross-band spectrum cap is to be applied***

*Q10. ISED is seeking comments on its proposal that the cross-band cap be applied across the 3500 MHz and 3800 MHz bands.*

*Q11a. ISED is seeking comments on its proposal that the maximum amount of spectrum that bidders in the 3800 MHz auction can acquire is a total of 100 MHz across the 3500 MHz and 3800 MHz bands.*

43. Sogetel notes that TELUS and Bell Mobility, who would not be eligible for set-aside status, are the only industry players who would support the implementation of a stand-alone cross-band cap rather than a set-aside. As previously noted, TELUS supports the implementation of



a cross-band cap and proposes that it be increased to 110 MHz. Bell Mobility rejects pro-competitive measures but states that a cross-band cap would be the least damaging.

44. This is not surprising, given the likelihood that these two NMSPs will enter into a network-sharing agreement for 5G, and their existing commercial agreement to share their 3G and 4G radio access networks. Sogetel submits that these players, even without breaching any ISED collusion rule, i.e. holding post-market structure discussions prior to the auction, will likely be allowed by ISED to bid separately, thereby countering the effects of a spectrum cap and acquiring between themselves 20 of the 45 blocks of the combined 3500 MHz and 3800 MHz bands.
45. Rogers went to great lengths in its submission to denounce the TELUS / Bell Mobility network-sharing agreement as unfair. Rogers rejected the use of a spectrum cap if it is not applied at the 'network level' rather than at the entity level. The spectrum-rich players SaskTel and Xplornet also rejected the use of a cross-band cap, preferring a 50 MHz set-aside (ISED's Option 1).
46. The rest of the industry is in favor of a cross-band cap, if used in conjunction with a set-aside. Some stakeholders, as previously discussed, proposed a variation in the number of blocks in the cap but the general industry support is for a combination of both measures.
47. Sogetel already demonstrated that a 100 MHz cross-band cap alone is insufficient to put spectrum in the hands of regional players.
48. Sogetel therefore reiterates its support for the implementation of a 100 MHz cross-band cap across the 3500 MHz and 3800 MHz bands, provided it is not detrimental to (i) the adoption of a set-aside measure for the 3800 MHz auction, or (ii) the increase in the quantity of spectrum of this set-aside to 100 MHz.

## Auction format and rules

*Q13. ISED is seeking comment on:*

- c. *If a set-aside is applied, stakeholder preference on whether the set-aside should be wholly contained in the unencumbered category or in the encumbered category in the 43 service areas with encumbrances, and the proposal to consider all blocks won by set-aside eligible bidders as set-aside blocks.*
49. Sogetel notes that the three NMSPs are requesting that if a set-aside measure is adopted, it be placed in the encumbered part of the band. Rogers claims that it would maximize the clean spectrum that the national networks can access, allowing two nationwide networks to serve these markets with a comparable amount of spectrum across the 3500 MHz and 3800 MHz bands.



50. Sogetel notes that a large portion of the encumbrance is in satellite-dependent areas that Rogers does not typically cover with its RAN. Sogetel questions why the unencumbered spectrum should go to NMSPs, the likely result were the set-aside spectrum to be located in encumbered blocks, thus depriving smaller service providers and WISPs of much-needed rural spectrum.
51. The rest of the industry supports ISED's proposal that the set-aside be wholly contained in the unencumbered category.
52. Obviously, should ISED agree to increase the set-aside to ten blocks, that would require the creation of two different set-aside products in the 43 areas with encumbrances.

*Q14. ISED is seeking comments on its proposal to use anonymous bidding during the auction.*

53. Sogetel supports the use of anonymous bidding, as per its submission filed in the comment phase of this Consultation process. Sogetel notes however that while the entire industry supported anonymous bidding, several stakeholders, including NMSPs and Xplornet, requested that the identity of set-aside eligible bidders, and the areas where they are eligible, be revealed prior to the auction.
54. Sogetel opposes this request as it would not have any positive impact on the spectrum allocation process, would risk putting anonymous bidding in jeopardy in instances where only one or a few entities are set-aside eligible in an area, and would only encourage NMSPs to launch legal challenges to the regulator's assessment of who is eligible and who is not, placing more control in the hands of those who already exercise market power and potentially delaying the spectrum allocation process.
55. Sogetel submits that ISED's current level of transparency on set-aside eligible entities is fine as it is.

### Conditions of licence for flexible use spectrum licences in 3800 MHz band

*Q23. ISED is seeking comments on its proposal to issue new flexible use spectrum licences in the 3800 MHz band with a 20-year licence term and the proposed wording of the condition of licence.*

56. Sogetel notes that while the industry is generally in support of the 20-year licence term, stakeholders including Bell Mobility, TELUS, Rogers, Xplornet and the CWTA noted that the burden of auction final payment – placed on auction winners two full years before the spectrum is available – would impair the ability of service providers to invest in their networks, by tying up significant capital resources. These stakeholders requested that spectrum payment be delayed until the spectrum is available. Requesting spectrum payment two years before the spectrum has been cleared by the satellite industry, they claim, would hold back the ability of service providers to meet the needs of Canadians and frustrate the overall objective of ISED's spectrum policy framework.



57. Cogeco, Eastlink and Quebecor supported the licence term but argued that the term should begin when spectrum is actually available without referring to payment timing.
58. Sogetel understands that from the perspective of administrative efficiency, ISED likely wants all 3800 MHz licences to begin and end at the same time. Sogetel submits that ISED could delay the beginning of the licence until March 31, 2025, the date on which FSS operations are required to clear the band. Early displacement of WBS users in areas where they can use the spectrum until 2027 could then be negotiated on a case-by-case basis if new licence holders wish to use the spectrum before the deadline.
59. Despite having initially supported ISED's proposal on the licence term and payment schedule in its original submission, Sogetel now believes that ISED should defer payment of licences for two years until the spectrum is usable and adjust the licence term accordingly. As pointed out by other stakeholders, this would free up capital for carriers in the near term to make substantial investments in Canada's 5G networks.

*Q25. ISED is seeking comments on the proposed deployment condition of licence as stated as well as on the proposed levels of deployment as specified in [annex B](#).*

*Q26. ISED is seeking comments on whether to accelerate the proposed timelines for deployment from what is proposed in [annex B](#).*

60. Sogetel notes that, except for the requests that the licence term be delayed until the spectrum is available and the timing of deployment requirements be aligned with the adjusted licence term, stakeholders generally accepted the deployment requirements proposed in annex B.
61. With the exception of CanWISP, which proposed more stringent deployment requirements despite the fact that spectrum will not be available in the first two years of the licence term, stakeholders generally rejected the imposition of more stringent deployment requirements. Sogetel considers CanWISP's proposal dangerous for smaller service providers as they are often not as agile as larger entities at establishing a robust deployment process and also have limitations in their ability to spend capital.
62. The proposed additional deployment requirements for long term evolution (LTE) mobile network operators, presented in annex C of the Consultation paper, were rejected by Bell Mobility, Rogers, TELUS, Videotron and Eastlink. Sogetel also rejected these additional deployment requirements as they are not applied equally among service providers (asymmetrical), penalize service providers who invested early in serving Canadians and are clearly unfair.
63. Sogetel reiterates its support for deployment requirements to ensure the spectrum is put to use to serve Canadian consumers but submits that the requirements need to respect the principle of fairness and be equally applied among all service providers: two service providers owning



spectrum in the same licence area should not face different deployment requirements based on their mobile LTE coverage at a given point in time.

64. Sogetel urges ISED to ensure deployment requirements are uniform among all service providers for a given band across a given licence area.

### Measures to support Canada's Connectivity Strategy

*Q28a. ISED is seeking comments on potential measures or conditions of licence that could accelerate Canada's Connectivity Strategy's target of 100% of the households covered with 50/10 Mbps within the timeframe of 2030.*

*Q28b. ISED is seeking comments as to the potential to increase deployment requirements in any relevant spectrum bands to increase both fixed and mobile services in rural and remote areas, and potentially provide coverage to currently underserved locations, such as roads.*

65. Since its inception in 1892, Sogetel has always been committed to improving connectivity for rural Canadians. Sogetel notes however that most industry stakeholders are generally aligned with its position to the effect that ISED has recently implemented or is in the process of implementing several measures to accelerate Canada's Connectivity Strategy's target of 100% of the households covered with 50/10 Mbps within the timeframe of 2030 and should not add to these measures before it has had a chance to assess the success of the measures already implemented.
66. Sogetel notes that CanWISP proposed a series of measures (including funding for WBS users to transition to 3900-3980 MHz and use of deployment requirements based on area rather than population) to further rural connectivity.
67. While Sogetel agrees with CanWISP that measures need to be accompanied by appropriate funding, Sogetel finds the use of deployment requirements based on area rather than population a dangerous proposal as it might lead to a significant amount of stranded capital in rural and remote areas.

**\*\*\*END OF DOCUMENT\*\*\***