



September 13, 2024

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Innovation, Science and Economic Development Canada
Engineering, Planning and Standards Branch
Senior Director, Space Services and International
6th Floor, East Tower
235 Queen Street
Ottawa ON K1A 0H5

Dear Sir/Madam:

Re: *Canada Gazette, Part 1, June 29, 2024, Notice No. SMSE – 006 – 24 — Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite – Eastlink comments*

Please find attached the comments of Bragg Communications Inc., carrying on business as Eastlink ("Eastlink"), in response to Canada Gazette Notice SMSE – 006 – 24 – *Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite*.

We appreciate the opportunity to provide our views to the Department.

Sincerely,

A handwritten signature in blue ink that reads "Marielle Wilson". The signature is written in a cursive, flowing style.

Marielle Wilson
Vice President, Regulatory

**CONSULTATION ON A POLICY, LICENSING AND TECHNICAL FRAMEWORK FOR
SUPPLEMENTAL MOBILE COVERAGE BY SATELLITE, PART 1, JUNE 29, 2024
(SMSE-006-24)**

**COMMENTS OF
BRAGG COMMUNICATIONS INC., OPERATING AS EASTLINK**



September 13, 2024

1. Bragg Communications Inc., carrying on business as Eastlink (“Eastlink”), appreciates the opportunity to provide comments on the issues raised under SMSE-006-24 – *Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite* (the “Consultation”).
2. Under the Consultation, Innovation, Science and Economic Development Canada (“ISED”) seeks comments on a policy, licensing and technical framework for the use of certain bands allocated to flexible use and/or commercial mobile services to support the expansion of coverage via satellite. ISED notes that supplemental mobile coverage by satellite (“SMCS”) holds promise for helping to close wireless coverage gaps, including along roads and highways. ISED outlines the following policy objectives for the Consultation:
 - expand mobile services particularly in unserved and underserved areas, including rural, remote, and Indigenous communities
 - promote competition in the provision of wireless services so that consumers and businesses benefit from greater choice and competitive prices
 - support increased reliability and resiliency of telecommunications services
 - foster investment and the evolution of wireless networks by enabling the development of innovative and emerging applications
3. Eastlink offers preliminary comments in response to the Consultation and reserves our right to comment further at the reply stage. Failure to provide comment on any part of the Consultation does not constitute agreement with a proposal where such agreement would be contrary to our interests.
4. Eastlink is supportive of ISED’s stated policy objectives. As noted in the Consultation, there have been several recent developments in the integration of satellite and terrestrial services, including partnerships that have emerged between satellite and terrestrial mobile service providers. These have included partnerships with Canada’s largest national wireless service providers.¹ As a regional wireless service provider, Eastlink has invested heavily in our

¹ See for example: *TELUS, TerreStar and Skylo demonstrate Canada’s first two-way communication between smartphones and satellites*, November 1, 2023, <https://www.telus.com/en/about/news-and-events/media-releases/telus-terrestar-and-skylo-demonstrate-canadas-first-two-way-communication->

spectrum holdings and network deployments to bring competitive service offerings to consumers in the areas we serve. In light of the emerging developments, it is essential that any SMCS framework carefully considers how to mitigate spectrum interference risks to the maximum extent possible. The pursuit of SMCS must not come at the expense of the reliability of existing terrestrial mobile networks. Eastlink is pleased that ISED is considering these risks under the Consultation.

5. As explained by ISED in the Consultation, SMCS is expected to bring mobile connectivity to areas that have previously lacked access entirely, including low population density areas including roads and highways. In this way, the use of SMCS to close wireless coverage gaps has the potential to promote greater mobile service reliability and overall public safety. As we have noted, some of the emerging partnerships between satellite providers and terrestrial mobile service providers include some of the country's largest mobile service providers. Given the potential public safety benefits of the use of SMCS, Eastlink submits the framework must include mandatory roaming as a condition of licence as soon as possible to ensure that Canadians who subscribe to any mobile service provider may benefit from the increased connectivity in these areas.
6. Eastlink has responded to certain questions from the Consultation below. We have not commented on all questions, but reserve the right to do so in the reply phase of this Consultation.

[between-smartphones-and-satellites](https://about.rogers.com/news-ideas/rogers-partners-with-lynk-global-to-bring-satellite-to-phone-coverage-to-canadians/); *Rogers Partners with Lynk Global to bring satellite-to-phone coverage to Canadians*, April 26, 2023, <https://about.rogers.com/news-ideas/rogers-partners-with-lynk-global-to-bring-satellite-to-phone-coverage-to-canadians/>.

Consultation questions

Q1 ISED is seeking comments on the proposed considerations to identify frequency bands where the proposed SMCS framework will be applied.

7. Eastlink supports ISED's proposed consideration to minimize potential interference concerns. Regional wireless service providers have made significant investments in their spectrum holdings in order to bring competitive mobile services to their customers, including in underserved and rural markets. Failure to adequately consider potential interference concerns within the framework could jeopardize the competitiveness of regional carriers, and could be detrimental to the overall reliability and resiliency of Canada's mobile networks, contrary to the ISED's stated policy objectives for this framework.

Q20 ISED seeks comments on whether Option 1 (implement a mandatory roaming requirement for SMCS licences that would take effect 5 years following the publication of a decision) or Option 2 (not impose a mandatory roaming requirement) would be most appropriate. Alternate options supported with a strong rationale may also be considered.

8. Eastlink submits that in order for the use of SMCS to bring the anticipated public safety benefits of added connectivity for unserved and underserved areas, SMCS licences must include a requirement for mandatory roaming. In Eastlink's view, it is not necessary to delay the implementation of a mandatory roaming requirement. Therefore, Eastlink opposes both proposed options and submits that a mandatory roaming requirement should be implemented as a condition of licence going forward from the finalization of the framework.
9. In the Consultation, ISED notes that as a new and emerging technology in an early stage of development, it may not be practical to apply mandatory roaming immediately. They explain that the immediate application of mandatory roaming could result in the unintended consequence of curtailing SMCS deployment by operators. Eastlink's preliminary view is that the complexities of accommodating roaming for SMCS should not be so significant to delay the adoption of and deployment of SMCS. As outlined in the Consultation, the use of SMCS is envisioned to supplement terrestrial mobile services in low population density areas and roads and highways, therefore it is not anticipated that the roaming traffic in these areas would have significant impacts on capacity. Further, service providers who support roaming on their SMCS deployments will benefit from the roaming revenues from that traffic to compensate for

the costs to support that traffic. Based on our preliminary view that the risk of a mandatory roaming requirement delaying adoption and deployment of SMCS is low, Eastlink submits that mandatory roaming for SMCS be implemented with immediate effect in order to ensure that Canadians can experience the anticipated enhanced connectivity and public safety benefits as soon as possible.

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