

# SaskTel Comments:

Gazette Notice SMSE-006-24

Consultation on a Policy, Licensing and  
Technical Framework for Supplemental Mobile  
Coverage by Satellite

September 13, 2024

## EXECUTIVE SUMMARY

1. The following is a summary of SaskTel's (Saskatchewan Telecommunications) submission in response to Gazette Notice SMSE-006-24 *Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite* ("the Consultation").
2. In the Consultation, the Department is proposing a new framework for a new technology: the ability of cellular devices to communicate with recently launched low earth orbit (LEO) satellites. This is referred to by the Department as "Direct-to-Device" (D2D) or "Supplemental Coverage by satellite" (SMCS). Although many similar devices have been in market for a number of years, this architecture is the first time common cellular devices would be able to communicate as such without any special modifications.
3. This new technology needs LEO satellites to deliver connectivity and those satellites are reliant on standard terrestrial network (TN) spectrum. This spectrum dependence is what creates an architecture most of the millions and millions of cellular devices currently in market can utilize, vs competing products that rely on satellite spectrum. It is also the source of most potential problems with D2D/SMCS services.
4. D2D/SMCS reliance on the 'reuse' of existing terrestrial spectrum makes ISED's involvement with policy around LEO deployment critical. Setting a governance framework to meet all the disparate goals of competing interests listed below will aid satellite service operators, terrestrial network operators, and, ultimately, consumers as it will help deliver an interference free communications environment. ISED must balance the following:
  - a. Interference – Interference concerns for existing terrestrial network spectrum users
  - b. Use Case Support – Commercial deployments vs emergency services vs technical capabilities.
  - c. Regulatory – Appropriate considerations outlined in 5.1 of the Consultation, such as 'benefit to Canadians', balanced against 'coexistence between different services'

5. All of these considerations are complex on their own, and only become much more complex with the cross impacts across these (and other) considerations and the various stakeholders. This context drives SaskTel's comments regarding the Proposed Framework.

### Decision Timing

6. ISED's consultation and potential decisions on D2D/SMCS are perhaps out in front of the international regulatory and policy leaders on the subject. SaskTel respectfully asks that ISED consider how it will align its policies and regulatory environment with international standards that have yet to be set. We do not ask for this alignment as a delay tactic, rather, we're most concerned about the interoperability of our technologies, deployments, and services with international deployments. We see the benefit of this approach on the wireless and wireline networks that are in place now and the concern is heightened where LEO satellites can literally be used to serve across borders.
7. As outlined in the Consultation Section 4.1, paragraph 39, the D2D architecture is quite novel. WRC-23 only outlines next steps to 'study possible technical and operational measures' for this 'emerging trend'. The yet to be published WRC-27 is when the initial synopsis on D2D from an international regulatory framework will be clarified, including ITU-R Resolution 253 providing the results to the topics to be studied.
8. Even America's FCC has not fully determined its path. The most recent FCC 'Report and Order and Further Notice of Proposed Rulemaking' in regards to D2D, referenced as 'Supplemental Coverage from Space' (SCS), the FCC defined certain aspects of SCS regarding spectrum blocks available & areas of service. However, they are still soliciting comments on other D2D considerations such as emergency services for a yet to be rendered decision on these items. Paragraphs 21 & 39 of the Department's Consultation outlines the FCC is still soliciting comments for several key items before rendering a decision (roaming, emergency services and radio astronomy), reflected in the ongoing, public docket 'GN 23-65' as available via the FCC website<sup>1</sup>.

<sup>1</sup> [FCC Docket GN 23-65](#)

9. Paragraphs 22 and 23 of the Department's Consultation go on to outline the various stages other international regulators still working through to bring this architecture to a viable commercial deployment, with some still only 'monitoring' (Ofcom), and some in a 'sandbox' state (Brazil/Anatel), but none with a commercial offering in market, nor a timeline on when & how that will occur.
10. Aligning with international standards is a critical consideration due to the relatively tight timeline the Department has outlined to move SMCS to a regulated commercial offering in Canada. The Department published the Consultation June 17, 2024, and per Paragraph 129, 'ISED intends for the new SMSC to take effect on April 1, 2025', a timeframe of only 288 days. Compare this with the ongoing FCC consultation referenced above, which is currently at day 568 since the initial 'Public Notice' issued Feb 23, 2023. With the complexity of the topics, disparate stakeholder concerns, and the current infancy of the technology, now may be a time for the Department to reconsider an overly aggressive timeline that doesn't align outcomes with yet-to-be-set international standards.
11. The Department should strive for an Interim Decision in the April 2025 timeframe. Such a decision could outline the minimum requirements to bring this coverage to a commercial offering, with a defined timeframe for a Final Decision to occur after the commercial offerings have reached a certain maturity, such as continuous coverage and, most importantly, an opportunity for ISED to align with international technologies, standards, and practices.
12. This would allow for greater stability for Canadians in making the initial coverage commercially available on interim standards and conditions. ISED could then follow up with a framework that aligns with international standards that ensures Canadians can expect to see similar services available to the rest of the world that are supplemental to terrestrial networks using industry standard technology and systems without causing major interference to the terrestrial networks that provide the service Canadians have come to rely on.

### **Emergency Services**

13. Throughout the Consultation, the Department touches on the potential for D2D/SMCS to deliver more emergency services connectivity for currently unserved areas of Canada.

14. SaskTel is familiar with challenges in deploying and ensuring reliability of a terrestrial network in 'deep rural' or 'remote' locations that are not feasible to serve via traditional terrestrial technologies. One only needs to review media reports of forest fires impacts in 2024 to terrestrial communications in Saskatchewan<sup>2</sup> and across Canada<sup>3</sup> to understand how tenuous reliability can be for these rural/remote locations. Paragraphs 8 and 9 of the Consultation detail terrestrial coverage gaps and the desire of the Minister to further the 'Telecommunications Reliability Agenda'. Paragraph 10 of the Consultation suggests that D2D's most likely use case is to 'effectively extending the [terrestrial] network' but acknowledges that 'initial service offerings are expected to be limited to text and voice'.
15. The current limitations of D2D are the key consideration when it comes to delivering emergency services over the SMCS architecture. User experience accessing emergency services over terrestrial networks has been developed over four decades of technical evolution, investment by network operators, and considered policy from the CRTC. The current reliability and robustness of terrestrial networks cannot be reproduced with D2D services overnight, especially given the early stages of development of D2D networks and the services provided over them. As outlined in Paragraph 10 of the Consultation, D2D coverage at its current state can only deliver a sub-set of current emergency services in an intermittent coverage scenario. We encourage caution in the initial roll out of standards for emergency services over D2D or the result may be that carriers choose not to deploy such services at all for fear of taking on the liability/consequences attached to delivering the service.
16. We encourage careful consideration of the impacts of regulation of D2D services before international standards are set and before the impacts of the regulation on how an early-stage service can be rolled out. If D2D standards for emergency services are too restrictive, ISED's policy may leave Canadians in a worse position. They will either not have service at all or, worse, they may expect

<sup>2</sup> [Creighton and Denare Beach, SK, under evacuation alerts as out-of-control wildfire burns nearby](#)

<sup>3</sup> [Phone and internet being restored after technicians fix wildfire-damaged line](#)

terrestrial-like access to emergency services, while not appreciating the limitations that will exist with D2D coverage for a period of time.

17. The Department should take a two-pronged approach:
  - a. An interim decision for D2D with a ‘lite touch’ as is done with similar emergency services through MSS/NTN bands, where essentially emergency service access is solely guided by CRTC policy. Following on, and as D2D matures, the Department should then consider a final decision on any spectrum specific policy regarding emergency services that can be rendered at a future date in conjunction with the appropriate CRTC policies regarding emergency services over wireless technologies.
  - b. The Department should initiate a study to develop a policy for D2D on Public Safety Broadband Network (PSBN) spectrum bands allocated in Canada. This would allow the Department to likely accelerate emergency service delivery to be on par with terrestrial networks in a more timely and efficient manner for Canadians.

### Commercial Offerings

18. Throughout the Consultation, the Department touches on the commercial mobile services D2D may deliver to Canadians. Paragraph 3 of ‘Policy Objectives’ notes that the goal of the Department is to ensure Canadians have access to ‘the latest wireless telecommunications’, while also ‘maximizing the economic and social benefits’. This policy goal is in harmony with most stakeholders to D2D deployment plans. A prime example is the joint Dec 14, 2023, media release from Rogers and Lynk.<sup>4</sup> Mobile Network Operators are keen on deploying new coverage for Canadians to close coverage gaps in a prudent manner, coupled with providing expanded services coverage.
19. The Department’s approach to the commercial services aspect of any D2D policy needs to take in account the current state of D2D and leave room for the

<sup>4</sup> <https://about.rogers.com/news-ideas/rogers-and-lynk-complete-historic-satellite-to-mobile-phone-call-in-canada/>

commercial evolution of the architecture so that innovation isn't stifled by policy decisions.

20. It is not to bold to state that decisions on major issues in this Consultation, such as geographic areas or mandatory roaming, could have a perverse effect on the commercial evolution, stifling the 'economic and social benefits' for Canadians.
21. The Department's approach to policy regarding D2D should look to the 'flexible use' licensing for 5G as the way forward. Flexible use has been developing since the original decision in DGSO-003-14 circa 2014, with the latest decisions in the later half of 2023 regarding SRSP-521 and RSS-198.
22. It is this measured approach over an appropriate timeframe that will foster the commercial development of D2D architecture in a similar fashion, meeting the principled approach of 'predictability and therefore business and investment certainty for stakeholders'<sup>5</sup> which leads to the deployment of commercial services; not policy decisions made in 288 days.

## SASKTEL RESPONSES TO ISED QUESTIONS

23. Saskatchewan Telecommunications ("SaskTel" or "the Company") is pleased to provide this response to Gazette Notice SMSE-006-24 *Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite*.
24. We have reviewed the Consultation and as a regional-based service provider, SaskTel hereby provides the Department input, suggestions, and recommendations on issues raised in the Consultation.
25. Please note that SaskTel has actively participated in the creation of the Radio Advisory Board of Canada (RABC) response to this Consultation and we are in full support of the RABC submission to this proceeding.

<sup>5</sup> <https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/learn-more/key-documents/consultations/spectrum-outlook-2018-2022#:~:text=predictability%20and%20therefore%20business%20and%20investment%20certainty%20for%20stakeholders>

26. SaskTel's individual responses to the questions posed in the Consultation are below. The section numbering of this document corresponds to the section numbering of the Consultation. Failure to address any particular issue or item, or the Comments made by any other party, should not be construed as agreement with those Comments where such agreement is not in the interests of SaskTel.

## **SASKTEL RESPONSE TO Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite**

**Q2 ISED is seeking comments on whether it should consider the service area size and/or the presence of mobile service providers holding the same frequency block as part of the general considerations for identifying frequency bands where the proposed SMCS framework will be applied.**

27. As commented on in the RABC submission, satellite beam power can be controlled in a fashion that supports 'adjacent service boundary limit shared with another mobile licensee'. Being that the proposed framework is predicated on a Satellite and Mobile operator commercial agreement (SMCS Agreement) for the spectrum bands allocated for the architecture, the SMCS policy should support the spectral area(s) contemplated by the licenses the Mobile operator is contributing to the commercial agreement. Although area sizing likely can not be supported at "Grid cell" level, the architecture would likely be supported well in rural and deep rural areas at a Tier 5 or larger Tier assignment.
28. That is to say, ISED should consider service area sizes tier 5 and larger as it relates to the applicable spectrum licenses available through this framework and as held by the mobile operator(s) party to the SMCS commercial agreement.

**Q6 ISED is seeking comments on any other bands that are used for commercial mobile services for which the SMCS framework should be applied.**

**In providing comments to the above questions, respondents are asked to include supporting rationale and arguments.**

29. The spectrum bands the Department is contemplating in the policy should all be made available for the SMCS service, unless there are technical reasons identified that warrant the exclusion of a certain band.

30. The Department should also consider making the Public Safety Broadband Network (PSBN) spectrum available to SMCS. As the Department has touched on, as the SMCS architecture matures over the next several years it will likely play a key role in providing emergency service coverage in areas that historically have not been feasible to be served via terrestrial means. Using PSBN spectrum to provide D2D services would align with the Department's stated objective in Paragraph 7 of SMSE-014-17<sup>6</sup>:

ISED's objective for the decisions outlined in this document is to make spectrum available in order to enable public safety communities access to modern technologies and new capabilities, while allowing the efficient use of the spectrum for the benefit of all Canadians.

31. When announced plans of SMCS operators fully mature in due course, having the proposed bands, including PSBN spectrum, available for D2D services would deliver coast to coast to coast emergency service coverage for all Canadians, including emergency service personnel in alignment with the stated objective. Consider the example of modern retail mobile networks. Most emergency services rely on the retail mobile network rather than any other network including PSBN spectrum, to communicate. Excluding emergency service personnel from leveraging SMCS coverage for this modern technology and new capability would leave those personnel and Canadians with continued limitations in their ability to exchange information with one another and communicate across jurisdictions during an emergency.

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<sup>6</sup> [SMSE-014-17](#)

**Q9 ISED is seeking comments on the roles that SMCS and terrestrial mobile service expansion may play, as well as any potential limitations, in providing greater mobile service coverage to Canadians, including along roads and highways.**

**In providing comments, respondents are asked to include supporting rationale and arguments.**

**Q10 ISED is seeking comments on its proposal that SMCS would not contribute to meeting deployment conditions associated with flexible use licences.**

**In providing comments, respondents are asked to include supporting rationale and arguments.**

32. The ability for a terrestrial mobile network operator to supplement subscriber coverage via this new SMCS architecture is in alignment both with the business plans of interested terrestrial operators, and what the Department expressed in the Outlook 2023 regarding the Policy Themes; ‘Spectrum as an economic driver’ and ‘Rural connectivity’ as two key themes that SMCS will likely play a role. As D2D technology matures and is able to provide a basis for connectivity for emergency services it will be a key component of helping reach the aspirational goals stated in the Departments ‘Spectrum Outlook 2023 to 2027’ of providing ‘broadband connectivity to 98% of Canadians’. To achieve these outcomes, it’s imperative that the decisions made in the course of this Consultation and follow ups hereto put the building blocks in place to support the economic development of D2D.
33. The Department’s initial position appears to be that SMCS coverage would not count towards terrestrial spectrum license deployment requirements and SaskTel believes this will both constrain D2D development and long-term sustainability.
34. D2D as a long-term solution for most of the travelled highways in the southern portion of Canada does not seem necessary as most said highways are covered. The limitations of D2D, latency and slower data speeds, will not satisfy most customers. SaskTel has most highways up to the central part of our province fully covered. It should be left to carriers like SaskTel who are working hard to expand coverage to determine whether D2D is appropriate in the circumstances and to work with D2D providers where necessary to fill in coverage.
35. In the short term, it may be a reasonable approach to restrict the use of terrestrial spectrum due to SMCS’ current limited services and non-continuous coverage.

However, as SMCS matures into an ecosystem more akin to the ‘companion’ terrestrial network, there is no technical reason the coverage delivered via SMCS should not count towards the deployment requirement for the terrestrial spectrum license involved. The position that SMCS/D2D should be viewed as no different from terrestrial coverage is actually aligned with the Department’s stated goals for spectrum deployment which is to ‘encourage the adoption of new technologies that are essential to Canada becoming a global centre for innovation and serve to create and strengthen a world-class terrestrial wireless infrastructure.’ Accordingly, there is no reason not to include SMCS/D2D coverage from the “coverage footprint” of a network operator for the purpose of calculating at least some of a terrestrial network operator’s deployment requirements.

**Q11 ISED is seeking comments on any considerations and/or limitations in providing network reliability and resilience using SMCS, based on the requirements in the MOU on Telecommunications Reliability.**

**Q12 ISED is seeking views on any considerations and/or limitations to providing emergency roaming using SMCS based on the requirements in the MOU on Telecommunications Reliability.**

**In providing comments to the above questions, respondents are asked to include supporting rationale and arguments.**

**Q13 ISED is seeking comment on the technical possibilities and limitations of SMCS for the provision of 9-1-1 access to all handsets from all service providers where there is SMCS satellite coverage.**

**Q14 ISED is seeking comments on how SMCS deployments would support the distribution of emergency alerts to mobile devices.**

**Q15 ISED is seeking comments on whether existing mechanisms will support emergency communications in the absence of a roaming agreement between providers, or whether a new obligation would be appropriate regarding this issue for SMCS.**

**In providing comments to the above questions, respondents are asked to include supporting rationale and arguments.**

36. As SMCS is a nascent service, it is too early to speculate what the appropriate level of requirements would be relating to delivery of emergency services over SMCS. A measured approach of incremental policies from the appropriate regulator, in line with standards established internationally over the coming few years, is the proposed approach. Such a phased rollout would reflect how the

industry and regulators have arrived the current state of emergency service support on terrestrial networks for over the last 40 years.

37. In particular response to question 14, SaskTel is of the opinion that D2D providers may need to develop systems to facilitate the rollout of emergency SMS, or text, notices. This will include tools for testing. SaskTel notes that this was a process for terrestrial networks and will likely be a technical undertaking for SMCS/D2D satellite operators.
38. Relating to Q15 regarding 'emergency communications in the absence of a roaming agreement', as outlined in the RABC response, there doesn't appear any technical limitations that would preclude the use of existing mechanisms that support emergency attachment. SaskTel agrees that 'emergency attachment', with detail of what type of attachment (i.e. SMS only), should be supported and communicated to other Canadian mobile network operators.

**Q16 ISED is seeking comments on its licensing proposals:**

- e. to issue all SMCS licences on a Tier 1 basis and to limit their scope to only those the service areas and frequency blocks held by the flexible use licensee where they plan to offer SMCS, as supported by the SMCS Agreement**

39. SaskTel is mostly in alignment with the Department's SMCS/D2D spectrum licensing proposal, that being to leverage existing spectrum licensing policies, rather than creating new/duplicate policies. This should be the desired regulatory approach when appropriate, and it is in this case, as it ensures regulatory certainty. Most importantly, SaskTel is supportive of using the current licensing framework because interference issues have clear guidelines and actions, which all terrestrial network operators rely upon to operate their current networks. Ensuring that SMCS operators are subject to the same regime will ensure network stability for terrestrial operators and all the Canadians who rely on our current services while hoping to benefit from a new, supplementary, product.
40. The Department's approach to SMSC licenses being issued on a Tier 1 basis, but limited in scope to where the terrestrial license(s) outlined in the corresponding SMCS Agreement apply regardless of associated tier, is an appropriate approach to this novel architecture. LEO satellites, the infrastructure used to provide

SMCS/D2D services, are of such a nature and type that Tier 1 licenses make the most sense.

41. The Department notes, in Paragraph 86 of the Consultation, that SMCS Licensee can request amendments to their [SMCS] license as terms are 'modified with updated frequency bands and/or areas after authorization related to an SMCS Agreement' (emphasis added). The Department should clarify that an SMCS License is available to be referenced in more than one SMCS Agreement, with the possibility that one SMCS provider may serve many different parties. If an SMCS License can be associated to more than one SMCS Agreement, with the SMCS License amended as each agreement and associated frequency bands come online, an annual term with a 'high expectation of renewal' is an appropriate approach.
42. One aspect not clear in the Department's proposed language is where the coverage information will be made public. Further, it isn't clear what detail will be provided through the licensing process. Coverage information would be required for to help manage Canadian's expectations regarding where the SMCS coverage is available, but more critically where a terrestrial network and SMCS coverage will need to coexist.
43. Although coverage information is typically publicly available via the 'marketing' materials from the operators holding the licenses, this only provides a generalized coverage profile, which is insufficient to manage coexistence. SMCS coverage will be delivered by satellite 'spot-beams', the profile of which does not correlate accurately to tier areas defined in terrestrial license(s) or to cell-sites as available in 'site data' from the Department's SMS, rendering those two datasets inaccurate to determine SMCS coverage. Again LEO satellites represent a new wrinkle in the technological landscape that require a novel approach to "coverage maps" for satellite service.
44. The Department's recent decision regarding Non-Competitive Licensing in SPB-001-23 requiring 'custom vector-based' data would be a suitable dataset for SMCS licensing as well. This type of public data would provide the required data for a neighbouring terrestrial network operator to initially assess coexistence to neighbouring SMCS coverage.

**Q18 ISED is seeking comments on its proposals on licence term:**

- a. For Canadian space station spectrum licences and foreign satellite approvals: a term that either aligns with the associated flexible use spectrum licence term or with the termination date of the agreement between the flexible use licensee and its partner satellite operator, whichever is earlier.**
- b. For generic earth station licences: annual spectrum licences for SMCS earth stations that will expire on March 31 of each year, with a high expectation of renewal. Licences would be renewed annually until the flexible use spectrum licence term ends, or when the associated SMCS Agreement is terminated, whichever is earlier.**

45. Annual spectrum licences for SMCS earth stations, with a high expectation of renewal, until either the terrestrial flexible use spectrum license or SMCS Agreement is terminated is an appropriate approach, as this is a common approach from the Department in several other licensing schemes. Being used to conversations around spectrum licensing, the strong expectation of renewal will be key for any party potentially making investment in SMCS infrastructure. As long as that licensing doesn't interfere with SaskTel's spectrum licence rights, we are quite supportive of potential licensees expecting to have access to the spectrum that leads to launch of their investments.

**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.**

**In providing comments to the above questions, respondents are asked to include supporting rationale and arguments.**

46. As outlined above regarding emergency services, the appropriate policy regarding Mandatory roaming is uncertain. SMCS is 'in the early stages of development'. The ability and timeframe of when the SMCS architecture can support certain services is unclear. As the Department notes in the Consultation, there currently does not exist an SMCS commercial deployment 'at scale' any where in the world.

47. Option 1 would seem to be the appropriate policy decision at this point in time, but without a strict timeline defined. The timeline for Mandatory Roaming should be more aligned with the technological advancements and maturity of the

architecture, once industry has experience regarding capacity management of the architecture. This would also be in alignment with SaskTel's proposed approach of an interim policy decision in April 2025, with a subsequent final decision at a later date, addressing topics such as roaming at a more appropriate timeframe in relation to SMCS maturity.

48. As outlined in response to Q15 above, emergency attachment in the absence of a roaming agreement between providers should still be available.

**Q22 Technical requirements to be applied to commercial mobile user equipment for SMCS: ISED is seeking comments on its proposal that existing technical requirements in the relevant SRSP and RSS in each frequency band would be sufficient for UE for SMCS.**

49. Leveraging existing policies and processes is suitable in this case, and SaskTel supports this approach.

**Q24 Interference resolution: Given that SMCS is proposed to operate on a NINP basis, ISED is seeking comments on its proposal to require operators of SMCS (both earth stations and satellite licensees) to assume the onus of mitigating any interference that occurs to licensed in-band and/or adjacent band/block terrestrial operations. ISED is seeking comments on any potential challenges in complying with the existing coexistence measures prescribed in the applicable technical standards.**

**Q27 Cross-border coexistence: ISED is seeking comments on its proposal to apply existing cross-border rules, as defined in the applicable TRAA, and on whether other technical considerations must be taken into account to ensure protection of cross-border terrestrial operations.**

**Q28 ISED is seeking comments on the extent to which technical factors such as ensuring coexistence, managing interference, etc. could impact SMCS coverage.**

**In providing comments to the above questions, respondents are asked to include supporting rationale and arguments.**

50. SaskTel supports the RABC comments filed in relation to these questions. SMCS Interference with terrestrial networks should be avoided. SMCS service for mobile use does not provide the quality, speed, or robustness that terrestrial networks do. Satellite services will provide services for people who are difficult or impossible to serve by terrestrial use. There must be a balance in regulation, where terrestrial network investment has been made, SMCS should be prevented from interfering.

Where SMCS is the only option, and terrestrial network deployment comes later, terrestrial networks should still be given priority of service due to increased quality of customer experience. But SMCS services should see protection from terrestrial interference that does not come from traditional retail mobile network style deployments made by mobile network operators.

## CONCLUSION

51. SaskTel provides the viewpoint of an effective, efficient regional service provider who continues to make significant investment in urban, rural, and remote Saskatchewan. We remain committed to expanding service in a sustainable, efficient manner, both for SaskTel and for the people of our province. Our history demonstrates our commitment to deploying the spectrum we obtain for the benefit of people in the province. SaskTel's input, suggestions, and recommendations on the questions raised in the Consultation are all directed towards supporting continued network development for the benefit of the people of Saskatchewan.
52. As outlined in our response, we applaud the Department's desire to move towards commercializing SMCS service in Canada to 'maximize the economic and social benefits that Canadians'. The policy contemplated will lay the groundwork for the expansion of both commercial offerings and critical emergency services to most Canadians as the SMCS architecture matures. In many areas of the country that currently lack terrestrial coverage, SMCS is one potential solution that could, if deployed properly, feasibly close that gap in wireless coverage, although it still has limitations in the form of speed, latency, and throughput.
53. SaskTel asks ISED to be judicious in its approach to regulation. The SMCS technology is still maturing as the Department itself acknowledged in the Consultation. Other regulators including the FCC are still developing their final rules, with several other jurisdictions at various stages of policy development. Further, technical bodies such as WRC have ongoing action items slated for further definition in 2027. With so much of the technical and regulatory environment still uncertain, SaskTel invites the Department to choose a flexible model that can be adjusted to technical and regulatory change while still supporting investment in the infrastructure necessary to support initial deployments.

54. It is with this Context in mind that our comments outlined certain aspects of the proposed framework be modified. A final decision in such a short timeframe appears premature; a more measured approach with an interim decision in the timeframe outlined appears more appropriate for a technology still maturing. Coupling support for investment with policy ensuring coexistence and interference can be properly managed, will ensure Canadian's access to existing terrestrial networks is not compromised and is only 'complemented'.
55. SaskTel is pleased to have had the opportunity to provide our inputs and comments to the important topic raised in this Consultation and hopes that our submission will provide a fuller view of this new licensing scheme.