RE: Canada Gazette Notice No. DGSO-006-12, Consultation on Renewal Process for 2300MHz and 3500MHz Licenses. (Published: October 20, 2012)

Thank you for the opportunity to submit comments on the renewal process for 2300 and 3500 megahertz licenses.

The Peace Region Internet Society (PRiS), registered in the Province of British Columbia as a Not-for-profit Society, has been providing Internet access to previously unserved rural and remote residences, businesses, and organizations of the Peace River region of BC since 1994. The connectivity offered has, over time, migrated from Dial-up to 1.5 Mbps Broadband, to our current transition to 5 Mbps Broadband capable of supporting the streaming multi-media services demanded today.

The Society recognizes that in order for broadband to be an engine for economic and social development, digital communication must be two-way symmetrical, and must be have sufficient, affordable capacity to ensure that neither contention for bandwidth, nor overriding usage restrictions compromise its utility to the citizens of our region. PRiS is of the belief that fixed point-to-multipoint wireless connectivity provides the most realistic alternative to reach these objectives in our widely dispersed rural and remote region. PRiS currently provides broadband connectivity to over 2500 such non-metropolitan members.

Demand for bandwidth increases on two fronts:

- More businesses and residents are seeking wireless connectivity
- Each subscriber is requiring orders of magnitude greater bandwidth than they considered adequate in the early days of broadband.

In earlier days, bandwidth was delivered adequately over great distances using the unlicensed frequencies that were allocated to the ISM/UNII bands. The utility of these frequencies has been eroding due to extensive use by consumer grade gear and “Power-Smart” data collection networks.
For the above reasons, the ‘Lightly Licensed’ (3.65-3.700 Ghz) frequencies have been a godsend. PRiS is making extensive use of this spectrum. PRiS is rebuilding its fixed wireless network using a dense network of WIMAX microcells with limited clients on each cell in this frequency band to replace its legacy network. Regrettably, the density of the network creates challenges in terms of frequency allocation in this band.

**Increasing the amount of Lightly-Licensed spectrum in the 3.5 Ghz range, contiguously with the 3.65 Ghz Block would significantly enhance the delivery of affordable modern-day broadband capacity to rural areas that are not part of the ‘wired-in’ world.** The need for additional spectrum is immediate, and there currently exists sufficient commercially available equipment to maximize its utilization on short notice.

PRiS notes that there are many rural regions where existing 3.5 Ghz Licenses continue to be severely underutilized within Tier 4 zones, and urges Industry Canada to favour policies that would increase its utilization for fixed wireless deployment without further delay.

For these reasons, The Peace Region Internet Society support the position of other rural Internet Service Providers in their recommendation to:

1. **Move the complete 3475 to 3650MHz band into the same licensing structure as the 3650 to 3700MHz band, shared spectrum lightly regulated licensing.** This approach provides 225MHz of spectrum space for the delivery of broadband services.

2. **Reallocate the current 3500MHz band in the following manner.** Blocks G,H,I,J (3550 to 3650MHz) be aligned with the FCC decision to make this shared spectrum. Blocks D,E,F (3475 to 3550MHz) be converted to TDD exclusive license blocks.

3. **A hybrid system where Tier-4 blocks with a population over 150,000 people retain the current licensing policy, and all other Tier-4 blocks use one of the two above options.** This allows the 31 Tier-4 Urban areas to benefit from exclusive licenses without restricting the delivery of broadband services in rural areas which will benefit the most from the additional spectrum.

Respectfully Submitted,

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System Administrator