January 30th, 2013,

Manager, Emerging Networks
Spectrum Management Operations Branch
Industry Canada
300 Slater Street, 15th Floor
Ottawa, Ontario
K1A 0C8

Subject: Canada Gazette, Part I, October 20, 2012 - Notice DGSO-006-12: Consultation on Renewal Process for 2300 MHz and 3500 MHz Licences

Dear Sir/Madam,

Canwisp appreciates the opportunity to provide comments on the Renewal Process for 2300Mhz and 3500Mhz Licenses.

Canwisp promotes the development, advancement and unification of the WISP industry. A WISP is a Wireless Internet Service Provider that utilizes terrestrial based fixed wireless technologies to distribute broadband or related Internet Protocol derived services. Although we are a new organization, we have managed to achieve a membership of 22 and compiled a mailing list of over 140 WISPs across Canada.

WISP’s use unlicensed spectrum in the following bands – (900Mhz) 25Mhz, (2400Mhz) 80Mhz, and (5800Mhz) 125Mhz, 230Mhz of spectrum. The 3650Mhz band provides an additional 50Mhz of lightly licensed spectrum, which has proven to be a god send for WISPs, now heavily used by WISPs to the point of having reached practical capacity in many markets. This business model has proven that it is possible for multiple users to share space and deliver reliable broadband services. As the demand for additional speed and services continues to rise, there will be a greater need for additional spectrum. Canadian consumers, especially those in underserved rural areas, will continue to suffer if the WISPs that serve them are unable to obtain affordable "carrier grade” spectrum.

Canwisp notes that the FCC has engaged in innovative thinking by proposing a Citizens Broadband Service that would make available 100Mhz of shared spectrum in the 3.5Ghz band using small cell and database technologies. The full benefits of Wireless Broadband can only be realized if the key players make a change in working cultures and embrace spectrum sharing. Canwisp views a band plan consultation for 3.5Ghz as being essential for consideration of this and other options to make more spectrum available for fixed wireless broadband applications in Canada. Canwisp requests that such a band plan consultation be initiated at the earliest possible opportunity.
Although Canwisp did not make a filing in the comment stage of this consultation, several of its members did:

- La coalition des fournisseurs d'accès à Internet sans-fil du Québec
  - GROUPE ACCES (Apertech Communications Inc.) - Aaron Remer aaron@acces.com
  - Télécommunications Xittel - Robert Proulx rproulx@xittel.net
  - Navigue.com - Borromée Thériault borromee@navigue.com
  - Duclos et Michaud Télécom - Denis Michaud denis@michaud.qc.ca
  - Digicom Technologies - Gilles Boily gboily@digicom.ca
  - Targo Communications - Louis-Paul Bourdon admin@targo.ca
  - Oricom Internet - Alain Bergeron abergeron@oricom.ca
  - Fleet Informatique - Mathieu Fleet admin@fleetinfo.info
  - Télédistribution Amos - Jonathan Parrot jonathan@cableamos.com
  - Centre de services informatiques Id logic - Doris Lamothe service@idlogic.com
  - Communications Télésignal - Jean-Marc Lavoie jm.lavoie@telesignal.ca
  - Coopérative de services Internet Pierre-de-Saurel - Yvon Gosselin yvongosselin@cooptique.net
  - Iteract.ca - Richard Labbe richardlabbe@iteract.ca

- AireNet – Ben Wirch ben@airenet.ca
- Chatham Internet Access – Wally Romansky – wally@ciaccess.com
- GL Mobile Communications – Glen Finch glenn@glmobile.com
- High Speed Crow – Bryan King bryan.king@highspeedcrow.ca
- Peace River Internet Society – Arvo Koppel – sysop@pris.ca
- Routcom Inc. – Jim Rout jrout@routcom.com
- Silo Wireless Inc. – Andreas J. Wiatowski andreas@silowireless.com

Canwisp and its members have had the opportunity to review the reply submission of the Canadian Network Operators Consortium Inc. (“CNOC”) in advance of filing and fully support CNOC’s position in this Consultation.

Aaron Remer
Chairman
Canwisp
300 Berge du Canal
Suite 316
Tel: (514) 762-4000 x 13
Email: aaron@acces.com