30 January 2013

Manager, Emerging Networks
DGSO
Industry Canada
300 Slater Street
Ottawa, Ontario
K1A 0C8

Dear Sir or Madam:


1. Ciel Satellite Limited Partnership (“Ciel”) has reviewed with interest the numerous submissions made by interested parties in connection with Industry Canada’s Consultation on Renewal Process for 2300 MHz and 3500 MHz Licences (DGSO-006-12) (the “Consultation”).

2. As explained in Ciel’s 17 December 2013 submission to the Consultation, the matters raised in the Consultation are of concern to both Ciel and Ciel’s majority shareholder SES S.A. due to the impact the decisions made in the Consultation may have on the viability of existing operations in the Fixed-Satellite Service (FSS) and on the future development of such services in Canada. The white paper annexed to Ciel’s submission¹ documents the growing issue of interference into the C-band FSS from 3500 MHz band terrestrial applications, and this remains the fundamental basis of Ciel’s concern in this matter.

3. However, Ciel wishes to comment specifically on two matters raised in the comments of other stakeholders filed with the Department.

4. A number of parties noted the release of a Notice of Proposed Rulemaking and Order for the 3500 MHz band (“NPRM”) by the FCC on December 12, 2012. The NPRM proposes to allocate the 3550-3650 MHz and 3650-3700 MHz bands (150 MHz of contiguous spectrum) for small cell deployments and shared spectrum use. As a result of the NPRM proceeding, some interested parties urged the Department to retain the maximum possible flexibility to review and revise the Canadian 3500 MHz spectrum utilization policy in the future, so as to maximize the potential for harmonization of spectrum use in Canada with that in the United States. Moreover, the suggestion was made that Industry Canada should initiate a further consultation in this regard. Ciel generally agrees with this suggested approach, and would welcome the opportunity to participate in such a consultation in the future.

5. In contrast to the approach suggested above, Bell Canada, Inukshuk Wireless Partnership, and Rogers Communications Partnership suggest in their joint comments that the Department should simply add a mobile allocation to the 3500 MHz band immediately and should permit licensees to implement mobile services in the band before the end of the proposed December 2017 licence term. Ciel disagrees strongly with the notion that such an allocation could be made without first fully assessing and understanding the potential impact of such an allocation on shared and adjacent bands.

6. To reiterate, it is vitally important that Industry Canada maintain and protect existing FSS operations in the Standard C-band in this proceeding.

All of which is respectfully submitted.

Sincerely,

Scott Gibson
Vice President & General Counsel
Ciel Satellite Limited Partnership