13 November 2013

Marc Dupuis
Director General
Engineering, Planning and Standards Branch
Industry Canada
235 Queen Street
Ottawa, ON K1A 0H5

Dear Mr. Dupuis:

Subject: Canada Gazette, Part I, 14 September 2013, Vol. 147, No. 37 - Notice No. SMSE-007-13, Consultation on Use of the Frequency Band 25.05-25.25 GHz, MTS Inc. and Allstream Inc.

1. MTS Inc. and Allstream Inc. (collectively MTS Allstream) is in receipt of Canada Gazette, Part I, 14 September 2013, Vol. 147, No. 37 - Notice No. SMSE-007-13, Consultation on Use of the Frequency Band 25.05-25.25 GHz, and files the following comments.

2. In Question 5-1 of SMSE-007-13, Industry Canada has proposed revisions to Footnote C44 of Canada’s Table of Frequency Allocations with regards to the use of the 25.05-25.25 GHz frequency band. The proposed change will eliminate the first sentence of Footnote C44 in order to not limit the use of the band to satellites associated with broadband-satellite service (BSS) and would not require feeder links to BSS space stations operated in the band 17.3-17.8 GHz to be implemented in the band 24.75-25.25 GHz.

3. MTS Allstream is not opposed to this proposal. The proposal allows harmonization with the US while allowing greater flexibility to license holders.

4. In Question 6-1, Industry Canada has proposed to define a coordination process to manage sharing and coordination of spectrum use between fixed and fixed satellite services in the 25.05-25.25 GHz band, and that the process be aligned with the US
Federal Communications Commission’s (FCC) established coordination process, SRSP-324.25.

5. MTS Allstream has no objections to the proposal for SMSE-007-13 Annex A, and the proposed SRSP-324.25 process. A clear, timely and coordinated process to address potential conflicts is preferable and will ensure that fixed services are protected from harmful interference.

Sincerely,

for Teresa Griffin-Muir
Vice President, Regulatory Affairs

*** End of Document ***