October 29, 2001

Jan Skora  
Director General, Radiocommunications and Broadcasting Regulatory Branch  
Industry Canada  
300 Slater Street  
Ottawa, ON  
K1A 0C8


Dear Mr. Skora:

TeraGo Networks Inc. (TNI) has reviewed the comments to Canada Gazette Notice DGRB-006-01.

Specific Comments

4. Spectrum Policy for the FWA Band – 3500 MHz (3400 – 3700 MHz)  
4.2 Proposal to Open FWA Spectrum at 3500 MHz

Bell Mobility, the RABC others have commented that increasing the supply of spectrum for FWA would undermine the economic viability of the broadband fixed wireless industry. TNI disagrees. Many of the current broadband fixed wireless systems deployed today rely on unlicensed spectrum. Unlicensed spectrum is a very good choice for network rollouts in areas where there are few users and or competitors. However, as the density of deployed equipment increases so to does the amount of time and effort required on behalf of operators to resolve interference issues. Increasing the supply of licensed spectrum below 10 GHz will stimulate the rapid rollout of FWA systems in both urban and rural environments by giving operators with exclusive spectrum to provide service to their customers.

4.3 Structure of FWA Spectrum at 3500 MHz

TNI reviewed with great interest the structure of FWA spectrum proposed by Lime wireless inc. TNI sees the merit in this approach as it meets the capabilities of current FDD technology while providing space for the deployment of TDD technology. TNI would also support Lime’s proposal to reserve spectrum for SMEs.

6. Eligibility and Spectrum Aggregation Limits  
6.2 Eligibility to Acquire Spectrum and Spectrum Aggregation Limits

In section 6.2 of the Consultation Document, Industry Canada asks for comments on whether a certain amount of spectrum should be set-aside for new entrants. TNI is strongly of the view that such a set-aside should indeed be implemented. This view has been echoed by most of the other smaller respondent while being rejected by Bell and Telus – arguably the companies with the most to gain by being allowed to acquire spectrum in all areas.
A set-aside approach is in the public interest because it will help bring about a more competitive local telecommunications market. A set-aside will preclude the incumbent dominant players in the local marketplace from further enhancing and entrenching their dominance by acquiring spectrum, not because they need the spectrum for their own operations, but rather to preclude other potential competitors from acquiring it.

Sincerely,

Wes Semeniuk
Vice President Technology & CTO