



January 16, 2015

Mr. Daniel Duguay
Director General
Engineering, Planning and Standards Branch
Spectrum Development and Operations
Industry Canada
300 Slater St. (JETN 15th)
Ottawa ON
K1A 0H5
Via e-mail: satellitelicences@ic.gc.ca

Re: *Canada Gazette*, Part 1, December 13, 2014, Notice No. SMSE-021-14 — *Fee Proposal for Fixed-Satellite Service (FSS) and Broadcasting-Satellite Service (BSS) Satellite Spectrum in Canada*

Dear Mr. Duguay:

The Satellite Industry Association (“SIA”)¹ hereby submits comments to the *Canada Gazette* Notice No. SMSE-021-14, *Fee Proposal for Fixed-Satellite Service (FSS) and Broadcasting-Satellite Service (BSS) Satellite Spectrum in Canada*.

¹ SIA is a U.S.-based trade association providing worldwide representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation twenty years ago, SIA has advocated for the unified voice of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. SIA Executive Members include: The Boeing Company; The DIRECTV Group; EchoStar Corporation; Harris CapRock Communications; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; LightSquared; Lockheed Martin Corporation; Northrop Grumman Corporation; SES Americom, Inc.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Airbus DS SatCom Government, Inc.; Artel, LLC; ATK Inc.; Cisco; Cobham SATCOM Land Systems; Comtech EF Data Corp.; DRS Technologies, Inc.; Eutelsat America Corp.; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Exelis, Inc.; Marshall Communications Corporation.; MTN Government; O3b Limited; Orbital Sciences Corporation; Panasonic Avionics Corporation; Row 44, Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; Vencore Inc.; and XTAR, LLC.

SIA applauds the Department's objective of establishing an attractive satellite licensing framework and believes that the fee proposal is mostly consistent with this objective. In particular, we support the imposition of the fee only upon successful launch of the licensed satellite. However, SIA recommends that the Department add language to exclude from the new fee FSS spectrum that is used solely for feeder link purposes by Mobile Satellite Service ("MSS") operators. As written, the proposal would result in a significant increase in fees for MSS operators using FSS solely for the purposes of feeder links and telemetry, tracking and control ("TT&C"). Such an increase would be inconsistent with offering an attractive licensing framework, and is not necessary to achieve the otherwise laudable objectives of the proposal.

The proposed twenty (20) year term with an expectation of renewal is consistent with current satellite designs. This license term will ensure continuity of service at licensed geostationary orbital locations for satellite operators' customers.

Finally, while SIA would prefer a shorter service standard, we note that ninety (90) business days for the issuance of FSS/BSS satellite licenses is comparable to other jurisdictions.

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

/s/

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