

April 17, 2006

Mr. Larry Shaw
Director General Telecommunications Policy
Industry Canada
300 Slater Street
Ottawa, Ontario K1A 0C8

Subject: Canada Gazette, Part I, Proposals and Changes to the Spectrum in Certain Bands Below 1.7 GHz – DGTP-004-05

Dear Mr. Shaw:

Fleetcom Inc. welcomes the opportunity to participate in public consultation on the proposal for changes to spectrum in certain bands below 1.7 GHz.

Fleetcom Inc. is a Toronto based telecommunications network provider offering digital two-way push-to-talk services at 900Mhz for various customers in the Greater Toronto Area. Fleetcom Inc. owns and manages its own private iDEN network. Fleetcom delivers innovative network services and real-time network applications that support medium and large-scale campus type operations across a diverse range of companies and public sector organizations.

Specific Responses

We wish to address specific sections of the proposal, namely Section 7 “Proposal to Release Spectrum for Mobile and Fixed Services in the 900 MHz Range.”

The Department invites comment on the following issues:

What band plan and technical standards should be established to efficiently use the bands 896 – 902 MHz and 935 – 941 MHz?

How best could these bands be aligned with those in the U.S. to bring about efficient use for the sharing of spectrum along the border?

Bandwidth available should be adequate to include and offer additional system applications while avoiding issues of interference. Opening up additional bandwidth in the 901 – 902 MHz and 940 – 941 MHz for digital, particularly iDEN digital network communications technologies would allow for an efficient use of spectrum. Fleetcom uses a 6:1 interleave ratio for interconnect calls and 6:1 ratio for dispatch calls simultaneously on a single 25KHz channel. The system is designed to operate within the 900 MHz range between 896-902 Rx, 935-941 Tx.) Additional spectrum for iDEN use only would greatly improve spectrum use.

Fleetcom Inc. supports the departments' proposal to open up additional bandwidth.

The Department invites comment on elevating the fixed service to primary status in the 944 – 952 MHz and on opening the band 944 – 952 MHz as additional spectrum to the band 953 – 960 MHz for wireless access in remote rural and northern areas of Canada.

Fleetcom Inc. has no specific comment on the requirement for additional spectrum for wireless access in remote rural and northern areas of Canada.

Fleetcom Inc. appreciates the opportunity to comment on this important topic.

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