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January 11, 2019

Broadcasting and Telecommunications Legislative Review Panel
c/o Innovation, Science and Economic Development Canada
235 Queen Street, 1st Floor
Ottawa, Ontario K1A 0H5

Dear Review Panel Members:

On behalf of the Association of Municipalities of Ontario (AMO), I write to you in response to the Call for Comments as part of the Telecom Review Panel's consultation process. AMO thanks the Panel for the opportunity to provide the Ontario municipal context on this important matter.

AMO is a non-profit organization representing almost all of Ontario's 444 municipal governments. The province has a total population of 14 million, divided into municipalities of varying sizes. For example, the majority of municipalities (271) have a population less than 10,000, while 34 have a population that exceeds 100,000. The geographical distances are just as varied, with 7 million people living in the Greater Toronto and Hamilton Area, and just under 1 million people living in Northern Ontario.¹

AMO has long argued that access to broadband and fixed wireless services should be equally accessible to residents, whether they live in a rural area or urban centre. Broadband speeds must also be continuously re-evaluated to ensure they remain reflective of the latest technological developments. The need for equal access is only increasing given that today's world is highly digitized, and the vast majority of jobs are dependent on local access to broadband and internet connectivity. Students and businesses need this access to compete and thrive in the global economy.

Today AMO is writing in support of the submissions made to the Panel by the Eastern Ontario Wardens' Caucus (EOWC), the Eastern Ontario Regional Network (EORN), and the Federation of Canadian Municipalities (FCM). We recognize that the Acts being reviewed are matters of federal jurisdiction. However, it is important to AMO as municipal governments play a pivotal logistical role as the owners and managers of the right-of way space where telecommunication infrastructure in Canada is installed. To that end, our comments are restricted to the *Telecommunications Act* and *Radiocommunication Act*.

¹ Province of Ontario, 2016 Census. Statistics Canada. <https://www12.statcan.gc.ca/census-recensement/2016/as-sa/fogs-spg/Facts-pr-eng.cfm?Lang=Eng&GK=PR&GC=35&TOPIC=1>

As noted by FCM in its submission, municipal governments are essential partners in achieving national connectivity objectives, and are committed to facilitating the timely, orderly, and cost-effective deployment of communications infrastructure. The role of municipal governments in managing public space for the benefit of all users is a task that no other entity can perform – operationally or legally. This role is central to achieving the federal government's objectives, particularly as the national deployment of 5G and small cell technologies is set to begin. That is why AMO agrees that achieving national connectivity objectives must build on and enhance the long-standing partnership with municipalities.

These partnerships are critical if the country wants to provide universal access and affordability to all Canadians, as AMO is concerned these issues will only be exacerbated in our province if system-wide solutions are not developed before the next wave of technology is implemented.

AMO supports EORN and FCM in their calls to develop a national broadband strategy that would help to reduce barriers to access by all Canadians to advanced telecommunications networks. This strategy should include long-term predictable funding programs and partnerships with provincial and municipal governments. It should also involve identifying and updating service objectives at regular intervals to accommodate changes in all areas, including those in rural, remote, and Indigenous communities.

AMO also agrees with EORN that general public safety should be a right of all Canadians, and that safety, security, and privacy should include the entire infrastructure. This includes the ability to place 911 calls from mobile and fixed devices and having the appropriate resources dispatched to the right location. It is also important that public safety workers are able to communicate with their own team in the field and at base, and can interoperate with other first responder services.

As noted by EORN, the continued demand on passive infrastructure associated with the rollout of current broadband technologies and the expected increase in demand for services will require continued cooperation between all owners of the infrastructure to ensure that the service demands of Canadians are met. It does not, however, require changes in the legislation that would take decision making away from municipal owners and assign the Canadian Radio-Television and Telecommunications Commission (CRTC), or any other group, to direct access and associated compensation.

During its joint review of these Acts, AMO encourages the Panel to respect the integrity of the local taxpayer and not indirectly transfer costs for the deployment of telecommunications infrastructure on the municipal tax base. AMO estimates that municipalities in Ontario need an additional \$4.9 billion per year for ten years to continue delivering today's services and close the infrastructure gap. For almost half of Ontario's municipal governments, a 1% property tax increase raises less than \$50,000.

In summary, we encourage the Panel to explore the opportunities outlined by EORN and FCM that could reduce system-wide expenditures to the benefit of everyone, without creating a larger property tax bill for Canadians in order to help fund the services of for-profit telecommunications carriers.

We thank you for your opportunity to comment, and appreciate the leadership provided by both EORN and FCM on this significant issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'JM', with a long horizontal line extending to the right.

Jamie McGarvey
AMO President
Mayor, Town of Parry Sound

cc: Vicki-May Hamm, President, Federation of Canadian Municipalities
David Fell, CEO, Eastern Ontario Regional Network