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Sent via email to: [ic.spectrumauctions-encheresduspectre.ic@canada.ca](mailto:ic.spectrumauctions-encheresduspectre.ic@canada.ca)

November 30, 2020

Innovation, Science and Economic Development Canada  
CD Howe Building  
235 Queen St  
Ottawa, Ontario K1A 0H5

**RE: Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band**

To Whom It May Concern,

The Association of Municipalities of Ontario (AMO) is a non-partisan, non-profit association that advocates for Ontario's 444 municipal governments to achieve shared goals and meet common challenges. One of these challenges is ensuring that all Ontarians have access to high-speed, quality, and affordable broadband and cellular connectivity.

AMO firmly believes that in the 21<sup>st</sup> century, broadband connectivity is a necessity, not a luxury. Municipal governments know first-hand how critical connectivity is for students, families, businesses, and seniors in their communities. Unfortunately, too many rural, remote, and northern communities struggle to connect. For those that have connection, even fewer can achieve the Canadian Radio-television and Telecommunications Commission's 2016 basic service objective.

That is why AMO is adding its voice to this consultation on behalf of our members and all communities in Ontario. Accessible, high-speed, and affordable broadband services ought to be available to all areas in Ontario, including in the rural and remote regions. Rural Ontarians rely on broadband as a lifeline and have been advocating for better service for decades.

AMO recognizes that development and deployment of the fifth generation of technology (5G) is essential to Canada becoming a global centre for innovation and will bring Canada to the forefront of digital development adoption. At the same time, it will be critical that repurposing the 3500-3650 MHz band, or portions thereof, for broadband wireless services is done in a way that does not displace services in rural, northern and remote communities. As the consultation states, satellites are currently the only means of reaching some communities in rural and remote areas, such as the North.

We encourage the Government of Canada to work with industry partners to ensure that as Innovation, Science and Economic Development Canada transitions the

spectrum bands that next-generation satellite technologies, such as high throughput satellites and low Earth orbit satellite constellations, continue to play an important role in supporting connectivity and bridging the digital divide between rural and urban areas.

Finally, as ISED transitions these spectrum bands, it will be important that the replacement of any technology associated with that transition be reasonable and affordable for those consumers who will be affected.

Sincerely,



Graydon Smith  
AMO President  
Mayor of the Town of Bracebridge

cc: The Honourable Maryam Monsef, Minister for Women and Gender Equality and Rural Economic Development  
The Honourable Navdeep Bains, Minister of Innovation, Science and Industry  
The Honourable Laurie Scott, Ontario Minister of Infrastructure  
The Honourable Steve Clark, Ontario Minister of Municipal Affairs and Housing  
The Honourable Ernie Hardeman, Ontario Minister of Agriculture, Food and Rural Affairs  
The Honourable Greg Rickford, Ontario Minister of Energy