



**November 16, 2020**

Adam Scott  
Director General  
Spectrum Licensing Policy Branch  
Innovation, Science and Economic Development Canada  
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**Subject:** *SLPB-002- 20: 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*

Dear Mr. Scott,

We are submitting this letter in response to the *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 (SLPB-002-20)*.

Our Board for the Federation of Northern Ontario is comprised of one member from each of the seven districts as well as one member from each of our major cities in north eastern Ontario.

As the main advocate for 110 cities, towns and municipalities across Northeast Ontario, we firmly believe in broadband connectivity being essential to our communities. Broadband connects us to the rest of Canada and the World, and our members and constituents rely heavily on broadband services in their daily lives. We have been recently in contact with Telesat, who has briefed us on their proposal and the context of this consultation, and we therefore understand the importance of mid-band spectrum and its value for broadband and mobile services.



We believe Canada is on the right track in terms of upgrading its broadband and mobile infrastructure for the future, and we commend the Government for their work on policy and regulation to ensure that Canada continues to follow global trends such as the shift to 5G.

In light of this, we thank ISED for the opportunity to comment on this transition process. We care deeply about the continuity, quality, and affordability of broadband services deployed in Northern Ontario. As mentioned, our communities rely on broadband for essential services including health, government, financial services, telephony, home internet, remote work, and online education, and particularly more so since the beginning of the COVID-19 pandemic.

This is why we care to underline how critical it is for our communities to ensure that their services are not disrupted, degraded, diminished, or affected in any way by this transition process. We also care deeply about the affordability of these services, and we are concerned about the externalities of what seems to be a highly costly and complex process to achieve.

Based on the two proposals presented in this consultation, only Telesat's proposal seems to clearly indicate a responsible party taking ownership of this transition and bearing all of its costs. In absence of Telesat managing and financing the clearing process, we are uncertain about the financial consequences of the alternative proposal. As the representative body for our many member communities and municipalities, we are very aware of the financial limitations that our members face. Therefore, we support Telesat's proposal given that it guarantees to cover all costs associated with the transition and to provide an uninterrupted service during the transition and after it is complete.

We believe this proposal is in the best interest of our member communities, our ISPs and service providers, and ultimately our end users and all Canadians. We also appreciate that this proposal supports and advances the deployment of Telesat LEO, which we believe will have a great impact on rural connectivity in Canada. We look forward to seeing this constellation come to life and provide high-speed internet affordably to all Canadians.

# FONOM

The Federation of Northern Ontario Municipalities

We are pleased to submit this letter for your consideration in support of Telesat's proposal.

Thank you for your time.

A handwritten signature in blue ink, appearing to read "Danny Whalen".

Sincerely, Danny Whalen  
President Federation of Northern Ontario Municipalities  
705-622-2479