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Brock Carlton
Ottawa, ON

February 13, 2019

Innovation, Science and Economic Development Canada
c/o Senior Director, Spectrum Licensing and Auction Operations
235 Queen Street, 6th Floor
Ottawa, Ontario, K1A 0H5
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Consultation on a New Set of Service Areas for Spectrum Licensing

Dear Madam/Sir:

The Federation of Canadian Municipalities (FCM) appreciates the opportunity to provide comments to Innovation, Science and Economic Development Canada (ISED) on the Consultation on a New Set of Service Areas for Spectrum Licensing.

FCM has been the national voice of municipal government since 1901. With 2,000 member municipalities, FCM represents the interests of municipal governments on policy and program matters that fall within federal jurisdiction. Members include Canada's largest cities, small urban and rural communities, and provincial and territorial municipal associations.

Broadband Internet access has become fundamental to modern life, and has the power to transform rural and northern Canada. Achieving the Canadian Radio-television and Telecommunications Commission's (CRTC) basic service objective of universal access to high-speed broadband is critical to enhancing Canada's global competitiveness and ensuring that all Canadians have access to affordable and reliable broadband service. For this reason, FCM has consistently called for the federal government to ensure licensing and auction processes are designed to incent and encourage an increase to broadband and wireless coverage in rural, remote and northern communities. Our comments below reflect that priority.

FCM acknowledges the policy objectives of this consultation, in particular, the recognition that additional access to spectrum within rural areas is necessary to meet current and future wireless needs and to support new technologies. Furthermore, FCM welcomes ISED's commitment to developing licensing policies that consider ongoing service provision in rural areas.

FCM encourages the federal government to make available necessary spectrum for rural and remote communities to access wireless broadband, and in particular, 5G wireless technology. It is important to consider the diverse needs of rural, remote and northern communities; a one-size-fits-all approach will not help communities achieve the CRTC's basic service objective. FCM supports the objective of ISED's proposed new set of services areas to better reflect both urban and rural service provider requirements.

According to ISED, where fee calculation is based on population, a smaller area size will correspond to a lower population figure and thus lower fees for each licence.

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Similarly, deployment requirements could be tailored to smaller individual areas. FCM continues to recommend that the federal government consider affordability in the development of broadband infrastructure to ensure access for all Canadians, whether they live in large cities or rural, northern and remote communities. As such, FCM supports the department's acknowledgement of the high cost of network deployment, particularly in rural areas, and welcomes initiatives to address network inefficiencies and strengthen wireless infrastructure.

FCM appreciates the opportunity to share its views with ISED on how the proposed new set of service areas for spectrum licensing can address the needs of rural, remote and northern communities in accessing reliable and affordable broadband services. FCM encourages the federal government to engage local governments on any changes to the use and allocation of spectrum, given the important potential impact these changes may have on rural and remote communities across Canada. As the consultation process for changes to spectrum licensing moves forward, FCM welcomes the opportunity to provide further comments.

For additional information or inquiries, please contact Jean Lawson, Policy Advisor, at jlawson@fcm.ca or 613-907-6246.

Sincerely,

A handwritten signature in black ink, appearing to be 'Brock Carlton', with a long horizontal flourish extending to the right.

Brock Carlton
Chief Executive Officer