



Innovation, Science and Economic Development Canada  
c/o Senior Director, Spectrum Operations  
235 Queen Street, 6<sup>th</sup> Floor  
Ottawa, Ontario K1A 0H5

**Re: Consultation on a New Set of Service Areas for Spectrum Licensing (DGSO-002-18)**

The Rural Municipalities of Alberta (RMA) represents the interests of Alberta's sixty-nine rural municipalities. RMA is submitting this letter in response to the proposal to create a new set of service areas for spectrum licensing (as published in Canada Gazette, Part 1, December 1, 2018, "Consultation on a New Set of Service Areas for Spectrum Licensing, DGSO-002-18). As an advocacy group for rural municipalities in Alberta, the RMA has a vested interest in broadband service provision, particularly in rural areas. This letter is intended to indicate RMA's interest in this consultation and will be followed by more detailed input in the coming weeks, based in part on reviewing the initial submissions received by Innovation, Science and Economic Development Canada (ISED) from other organizations. That input will meet the March 21, 2019 deadline for reply comments.

In general, additional service areas are likely to support improved rural broadband access, as they will help to mitigate past challenges associated with allocating spectrum for rural fixed wireless access in large Tier 4 service areas. RMA will likely present a position on which of the two options presented is preferable in a more detailed submission as part of the comments on submissions from other organizations. While the various Tier 5 service area design options may result in different outcomes, clear guidelines on how spectrum in new Tier 5 service areas is to be deployed will be just as critical. When spectrum is deployed, it should benefit an entire service area, rather than simply the population centres within one.

In addition to the options for defining Tier 5 service area boundaries, RMA also looks forward to providing further comment on the proposed design principles, particularly related to the concept of fostering demand. While RMA appreciates the importance of a service area being commercially viable, the definition of such a term would likely vary across Canada. Additionally, areas that currently have a limited population base or economic activity may most need investment in both spectrum and broadband infrastructure to develop in the future. Requiring that such areas be placed within a Tier 5 boundary with a more economically viable area has potential to support broadband development in the low-demand area, but only if requirements for how spectrum is deployed ensure that service is available in the entire Tier 5 area.

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Providing rural broadband to Canadians is a goal of the Canadian Radio-television and Telecommunications Commission (CRTC). Any changes to service areas should be done in a way that facilitates the growth of broadband service in rural areas. RMA appreciates the opportunity to comment on the ISED consultation, and particularly welcomes the questions directly related to rural broadband service.

The RMA is looking forward to responding to comments from other submissions and welcomes the opportunity for continued participation in creating the new service area designation.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Kemmere", written in a cursive style.

Al Kemmere, President

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