



February 14, 2019

Innovation, Science and Economic Development Canada  
c/o Senior Director, Spectrum Operations  
[ic.spectrumoperations-operationsduspectre.ic@canada.ca](mailto:ic.spectrumoperations-operationsduspectre.ic@canada.ca)

Dear Senior Director:

**Subject: Canada Gazette, Part I, December 19, 2019, Consultation on a New Set of Service Areas for Spectrum Licensing (DGSO- 002-18)**

On behalf of the Saskatchewan Association of Rural Municipalities (SARM) Board of Directors, we would like to take this opportunity to provide comments to the ISED on its Consultation on a New Set of Service Areas for Spectrum Licensing.

SARM has lobbied extensively for the federal government to ensure that adequate rural spectrum can be accessed by service providers who are indeed willing to bring service to rural Saskatchewan. Under the current 4 tiered system Internet Service Providers (ISP) are able to buy a license to use the province-wide Saskatchewan bandwidth with no requirement that it be deployed in rural areas as they are defined in Saskatchewan; ISPs could meet their rural service quota simply by providing service to an urban center that fell within the tier 4 boundaries.

Consequently, SARM has argued that licensees should be required to provide service to a higher percentage of potential users that fall within tier 4 boundaries. However, creating a new service area that distinguishes between high and low population areas may have a better result if ISED follows its proposed design principles; specifically, that "(e)ach service area should include either a population base or some economic value that would foster demand for acquiring the spectrum license". Without this value, SARM is concerned that the creation of Tier 5, and alternative licensing approaches for different areas that this would allow, may have the result of service providers accessing licenses for smaller area sizes with more users over providing service to larger and more sparsely populated rural areas.

We believe that 'Option 2' for a Tier 5 service area with boundaries based on the proposed minimum population for small population centre service areas would be the best of the two options provided.

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Senior Director

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We do believe that if a fifth tier is to be implemented then each of the four types of service areas (large, medium, small populations centres, and remaining areas) must have different deployment requirements based on their population characteristics and area to be served. Additionally, significant subsidies (loans and grants) and/or spectrum licensing should favor deployment in those deemed 'remaining areas'.

Finally, we would like to take this opportunity to reiterate the need for existing and proposed rules for broadband auctions and corresponding licenses reviewed through a rural lens to improve rural access to both high speed internet and cellular data connectivity. Reliable access to broadband is important for the health, safety, and well-being of those living and travelling in rural and remote areas.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Ray Orb". The signature is written in a cursive, slightly slanted style.

Ray Orb  
President  
SARM

Cc: The Honourable Bernadette Jordan, Minister of Rural Economic Development