

# SaskTel Comments:

Gazette Notice DGSO-002-21

Consultation on Amending  
CPC-2-0-03 – Radiocommunication and  
Broadcasting Antenna Systems

April 15, 2021

## INTRODUCTION

1. Saskatchewan Telecommunications (“SaskTel” or “the Company”) is pleased to provide this response to Gazette Notice DGSO-002-21 *Consultation on Amending CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems* (“the Consultation”).
2. We have reviewed the Consultation on the Department’s proposed amendments to Client Procedures Circular CPC-2-0-03 covering the processes required for parties seeking to install or modify antenna systems. As a regional-based service provider, SaskTel hereby provides the Department input, suggestions, and recommendations on questions raised in the Consultation.
3. SaskTel’s detailed responses to the questions posed in the Consultation are below. The section numbering of this document corresponds to the section numbering of the Consultation. Failure to address any particular issue or item, or the Comments made by any other party, should not be construed as agreement with those Comments where such agreement is not in the interests of SaskTel.

## SASKTEL RESPONSE TO THE CONSULTATION ON AMENDING CPC-2-0-03 - RADIOCOMMUNICATION AND BROADCASTING ANTENNA SYSTEMS

6. ***Proposed Amendments to CPC-2-0-03***
  - 6.1. ***Proposed implementation of official languages requirements for the public consultation process***

### **Q1**

**ISED invites comments on:**

- a. **the introduction of official language requirements and whether they should be applied across Canada or in the communities set out above**
- b. **the timing of the introduction of the requirements proposed by ISED**
- c. **any other aspects related to the wording or implementation of the proposals**

4. SaskTel works closely with local land-use authorities during the process of planning and constructing new radio sites and tower locations and obtaining the necessary approvals. We understand the importance of conducting appropriate public consultations to ensure the concerns of all affected local residents are

identified and addressed. SaskTel has over 900 cell sites in operation, and like other wireless service providers SaskTel is constantly planning and building additional sites to improve and extend wireless broadband services to both urban and rural Saskatchewan.

5. In the Consultation the Department has proposed two options for the inclusion of bilingual documentation and correspondence in the public consultation process for new or modified antenna systems.

6. Option 1: In Option 1 the Department has proposed that

*The official languages requirements would apply across Canada and specify:*

- a. that all initial communications with the public must be made in both official languages;*
- b. that if a member of the public provides written or verbal comments, the proponent must respond in the official language in which the comments were made.<sup>1</sup>*

7. SaskTel opposes the proposed Option 1. Although SaskTel understands the importance of bilingualism in today's society, the increased expense of complying with a ubiquitous requirement for bilingual documentation and correspondence in the public consultation process is simply not justified considering the extremely low number of Saskatchewan residents that would require or benefit from bilingual correspondence.

8. Providing wireless broadband services in rural areas is difficult due to the high infrastructure costs, low population densities and therefore very often there is no business case to support the rural wireless service. Serving rural residents requires close attention to all network infrastructure and business costs, including the costs of the public consultation processes.

9. Option 2: In Option 2, the Department has proposed that the official languages requirement would only apply where Statistics Canada census data shows a linguistic minority population percentage of at least 5%. From the Consultation:

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<sup>1</sup> The Consultation, paragraph 15

*The official languages requirements stated in Option 1, above, would only apply in circumstances where the proposed antenna system installation or modification would be located in a community (a census subdivision) where the English or French linguistic minority population meets a minimum threshold percentage of 5%.<sup>2</sup>*

10. SaskTel opposes Option 2 as well for the simple reason that linguistics census data for a given community does not reflect if that language is actually spoken, and more importantly does not accurately reflect what language(s) are used to conduct business in that community.
11. Based on SaskTel's experience in dealing with land-use authorities all across Saskatchewan, it is anticipated that there will be very limited benefits versus the cost of implementing bilingual public consultation processes for many of the communities listed in Annex A of the Consultation.
12. SaskTel's Recommended Option: Given our experience in conducting public consultation processes all across Saskatchewan, SaskTel proposes that the official languages requirements as laid out in the Consultation only be required to be followed where the local land-use authority requests or requires a bilingual public consultation process be implemented. Allowing the local land-use authority to determine the need for bilingual correspondence will best reflect the culture and linguistic profile for the individual community, while allowing wireless service providers to reduce unnecessary costs in the consultation process. This will in turn encourage rural deployments by reducing the overall cost of providing service to underserved rural areas.
13. SaskTel recommends the following wording be added to CPC-2-0-03:

**Whether the proponent follows the land-use authority's consultation process or ISED's default public consultation process, consultation with communities, must be conducted in both official languages if the land-use authority requests or requires a bilingual public consultation process. Proponents must follow the consultation process established by the land-use authority, where one exists. In the event that a land-use authority's existing process requires bilingual communications with the**

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<sup>2</sup> The Consultation, paragraph 16

**public, proponents must follow those public consultation requirements regardless of the linguistic minority population figures.**

14. **Timing:** SaskTel agrees with the Department's proposal that the new official languages requirements resulting from decisions made by the Department apply to public consultations starting April 1, 2022.

**Q2**

**ISED invites comments on the proposal to make minor amendments to CPC-2-0-03, including updating the name of the Department to ISED throughout, and updating references relating to the environmental considerations and aeronautical safety responsibilities as described above.**

15. SaskTel agrees with the Department's proposals for other minor amendments to CPC-2-0-03, including updating references to the name of the Department, and updating references related to the environmental considerations and aeronautical safety responsibilities as described in section 6.2 of the Consultation.

**CONCLUSION**

16. SaskTel has reviewed the Consultation regarding the Department's proposed amendments to CPC-2-0-03. As a regional-based service provider, SaskTel has provided the Department input, suggestions, and recommendations on the questions raised in the Consultation.
17. SaskTel is pleased to have had the opportunity to provide our inputs and comments to the important issues raised in this Consultation and hopes that our submission will provide a fuller view of these issues to the Department.