



May 14, 2021

**Via Email:** ic.spectrumoperations-operationsduspectre.ic@canada.ca

Innovation, Science and Economic Development Canada  
Senior Director, Spectrum Management Operations Branch  
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**Re: Consultation on Amending CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems (the “Consultation”) – Comments of Shaw Communications Inc. (“Shaw”)**

Shaw has reviewed the above-referenced Consultation and is pleased to provide the following comments on behalf of itself and Freedom Mobile Inc. (“Freedom”). In these comments, Shaw addresses both of the questions presented in the Consultation.

Shaw supports the Department’s objectives in this Consultation. The community consultation process is important to ensure that the needs of Canadians and their communities are considered when antenna siting and design decisions are made. These consultations also help to correct misinformation about emerging wireless technologies, such as 5G. It is therefore essential that these consultation processes are accessible and transparent. To this end, we agree with the Department that this is an appropriate time to address official languages requirements in the Client Procedures Circular CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems (“CPC-2-0-03” or the “Framework”). Canada is a country of two official languages and the implementation of official language requirements for public consultation processes would improve accessibility and facilitate better public engagement.

It is also important for the Department to aim to preserve the efficiency of these consultation processes. This will become even more critical as demand for access to mobile broadband services increases, which the Department has observed. For this reason, Shaw recommends that the Department move forward to modify CPC-2-0-03 to include an official languages requirement in the context of consultations where the proposed antenna system installation or modification would be located in a community where the English or French linguistic minority population meets a minimum threshold percentage of 5% (Option 2).<sup>1</sup>

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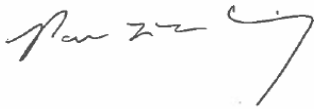
<sup>1</sup> As listed in Annex A of the Consultation.

In Shaw's view, Option 2 appropriately fosters public engagement by focusing the new requirements in certain official language minority communities. Since, outside of these areas, the requirements would have no impact on the level of public engagement, it would be inefficient to impose them across Canada. Shaw further notes that, as stated in the Consultation, proponents must continue to follow public consultation requirements set out by the applicable land-use authority, which may specify an existing process requiring bilingual communications. Rural broadband and 5G deployment will, in particular, continue to drive the need for new and modified antenna systems, and it is important that the Framework not create unnecessary constraints that would delay or hinder network deployment.

Shaw is also supportive of the other amendments to the Framework proposed in section 6.2 of the Consultation. These updates ensure the information and references in the Framework are current and accurate and will help to avoid confusion in its interpretation and implementation.

Thank you for the opportunity to provide these comments.

Shaw Communications Inc.

A handwritten signature in black ink, appearing to read "Paul Cowling", with a stylized flourish at the end.

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