



RMA
RURAL MUNICIPALITIES
of ALBERTA

RMA Submission on the Technical and Policy Framework for the 3800 MHz Band

October 15, 2020



1. This submission is made regarding Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band (SLPB-002-20), as announced in the *Canada Gazette* Part I, Volume 154, Number 37 on September 12, 2020.
2. The Rural Municipalities of Alberta (RMA) advocates on behalf of Alberta's sixty-nine rural municipalities. RMA members have several common traits: large land masses, relatively small populations, and a lack of a traditional "population center." RMA members provide municipal government to approximately 85% of Alberta's land mass, and therefore have unique concerns and perspectives on many issues.
3. While RMA does not have the technical expertise, nor is it within our scope, to respond to every question in the consultation document, certain questions related to the provision of internet service in rural areas are important to RMA and its members. The responses will quote the corresponding question number from the consultation document.
4. RMA is concerned about reallocating bandwidth on the 3800 MHz spectrum to 5G without an established plan to provide continuity of service for rural Albertans who receive their internet through a wireless internet service provider (WISP). To this end, the consultation document does not detail how the development of 5G technology will facilitate broadband access in rural areas.
5. Much of rural Alberta already falls well short of the 50 mbps download and 10 mbps upload speed goals set by the Government of Canada as a universal service level. There are various reasons for this, including the reality that there is not currently a business case to develop rural broadband in much of rural Alberta. RMA appreciates recent funding commitments, such as the Universal Broadband Fund, however, given that current funding programs have been unable to provide service to all of Alberta with existing technology, it is unclear how reallocating a spectrum that is currently being successfully used to serve rural Alberta will benefit access. RMA requests ISED release a public document explaining how 5G technology will increase access to highspeed internet in rural areas, especially rural and remote areas.
6. In response to Q5: ISED asserts that flexible use licensing in the 3650-4000 MHz band will allow licensees to be responsive to the service their customers demand. This is true, however it does not provide a guarantee that a licensee will continue to provide fixed wireless service. For example, if a licensee can reallocate their licensed bandwidth to 5G service, they may be incentivized to do so to meet the growing demand. It is foreseeable this will come along with a loss of service or reduction in speed for existing fixed wireless customers. As a result, any change to the flexibility of spectrum licenses must come with a guarantee that existing and future fixed wireless customers can access these services.
7. In response to Q8: RMA supports the ISED proposal to maintain a primary allocation to FSS in the entire 3700-4200 MHz band and the proposal that existing FSS earth stations in satellite-dependent areas remain licensed in the entire 3700-4200 MHz band.
8. In response to Q18: a moratorium on the development of new wireless broadband services (WBS) in rural areas may be counter to the 50/10 universal speed goal. Much of rural Alberta falls well short of this universal standard, and it is unclear how a moratorium on WBS will help achieve these speeds in rural Alberta.
9. RMA does not have the technical experience to comment on the specifics of proposed changes to the licensing and spectrum allocation for FSS earth stations. However, as Alberta is home to satellite dependent communities, RMA's position is that any changes to the licensing or use of

infrastructure currently being used to provide internet in rural areas must include a plan to replace these services. Additionally, this plan must include steps to provide service to facilitate growth in rural areas and increase speeds to meet the 50/10 universal service standard.

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