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Chef de la direction**

Brock Carlton
Ottawa, ON

24, rue Clarence Street,
Ottawa, Ontario, K1N 5P3

T. 613-241-5221
F. 613-241-7440

www.fcm.ca

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Senior Director
Spectrum Licensing and Auction Operations
Innovation Science and Economic Development
235 Queen Street
Ottawa, Ontario K1A 0H5
ic.spectrumauctions-encheresduspectre.ic@canada.ca

Canada Gazette, Part I, August 2017, Consultation on a Technical, Policy and Licensing Framework for Spectrum in the 600 MHz (SLPB-005-17)

Dear Madam/Sir:

1. The Department has issued a paper titled **Consultation on a Technical, Policy and Licensing Framework for Spectrum in the 600 MHz** ("the Consultation Paper"). In the Consultation Paper, the Department has invited comments and reply comments on the technical, policy and licensing considerations including format, rules and processes, as well as on conditions of licence for spectrum in the 600 MHz band.
2. The Federation of Canadian Municipalities (FCM) appreciates the opportunity to provide comments on the above-noted consultation.
3. FCM has been the national voice of municipal government since 1901. With close to, 2,000 member municipalities, FCM represents the interests of municipal governments on policy and program matters that fall within federal jurisdiction. Members include Canada's largest cities, small urban and rural communities, and provincial and territorial municipal associations.
4. In 2012, FCM submitted comments to Industry Canada on a paper titled *Consultation on a Licensing Framework for Mobile Broadband Services (MBS) – 700 MHz Band*. FCM's letter outlined the need for the 700 MHz auction to incent and encourage winning carriers to increase broadband and cellular coverage in rural, remote and northern communities. It continues to be pertinent for the federal government to improve coverage in these areas so that communities across Canada can connect to the digital economy.
5. Broadband Internet access has become fundamental to modern life, and has the power to transform rural and northern Canada. Achieving the Canadian Radio-television and Telecommunications Commission's (CRTC) basic service objective of universal access to high-speed broadband is critical to enhancing Canada's global competitiveness and ensuring that all Canadians have access to affordable and reliable broadband service.



6. FCM supports the department's acknowledgement of the high cost of network deployment, particularly in rural areas, and welcomes initiatives to address network inefficiencies and strengthen wireless infrastructure. It is important for provisions to be included to incent and encourage winning carriers to increase broadband and cellular coverage in rural, remote and northern communities.
7. The proposed deployment requirements would create an obligation for licensees to continue to build-out over time, in support of providing Canadians with timely access to the most advanced wireless technologies and devices. FCM welcomes this initiative to encourage the continued development of broadband Internet infrastructure.
8. The Consultation Paper proposes that licensees must comply with the mandatory antenna tower and site sharing requirements set out in *Client Procedures Circular CPC-2-0-17, Conditions of Licence for Mandatory Roaming and Antenna Tower and Site Sharing and to Prohibit Exclusive Site Arrangements*, as amended from time to time. FCM supports these requirements and the robust local consultation process outlined in the *Antenna Tower Siting Procedures*.
9. FCM supports the proposal that opening bids in the North be adjusted to 50% of the initial 700 MHz bids, given that one licence was not sold during the 700 MHz auction in this area. It is important to encourage telecommunications companies to service northern communities.
10. Closing the broadband gap and reducing the significant lag-time in bringing faster speeds to rural and remote areas will require building off the success of the federal government's "Connect to Innovate" program and the CRTC's new funding regime. The auction and licensing framework for spectrum in the 600 MHz band is an opportunity to allow providers to increase the network capacity to meet the traffic demands of higher usage rates, and support the deployment of next-generation wireless technologies.
11. FCM appreciates the opportunity to share its views with the Department on how the proposed licensing framework for spectrum in the 600 MHz band can address the needs of rural, remote and northern communities in accessing reliable and affordable mobile broadband services.

Sincerely,



Jenny Gerbasi
Deputy Mayor, City of Winnipeg
FCM President