

December 11, 2017

Director, Spectrum Regulatory Best Practices
Innovation, Science and Economic Development Canada
235 Queen Street
Ottawa, ON K1A 0A5



Dear Sir/Madam:

**Canada Gazette, Part I, October 6, 2017, SLPB-006-17
Consultation on the Spectrum Outlook 2018 to 2022**

On behalf of Victoria County Municipal Council, I am responding to the Innovation, Science and Economic Development (ISED) Spectrum Consultation now underway.

Victoria County is a large, sparsely populated, rural municipality. Except in a few small villages, the great majority of our households and businesses rely on internet connections from Wireless Internet Service Providers (WISPs) such as Seaside Wireless Communications, using fixed TD-LTE in the 3.65 GHz band. We have seen steady improvement in the capability of this service, from an initial offering of 1.5 Mbps a decade ago to current speeds up to 10 Mbps.

It is our understanding that this technology is capable of significantly higher speeds, but achieving them will require continued equitable access to spectrum. However, potential policy changes currently being considered by ISED raise the prospect of access to spectrum for fixed-wireless WISPs being diminished. Victoria County Council fully supports the submission by Seaside urging WISP access to licensed spectrum between 3400-3700 MHz.

Investments by the federal and provincial governments, and by private companies like Seaside, have built a substantial fixed wireless infrastructure throughout our county, and much of Nova Scotia. Our concern is that, without access to appropriate spectrum, after a decade of this development, our residents and businesses could be left behind as the need for higher speeds and greater bandwidth expands.

By a unanimous vote on December 11, 2017, Victoria County Municipal Council urges ISED to consider our concerns and comments as you decide on spectrum allocation for 2018 to 2022 and beyond. Your decision will play a pivotal role in the success of our residents and businesses for years to come.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Morrison", is written over a horizontal line.

Warden Bruce Morrison

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