

**Date:** October 1, 2024

**Comment from the Indigenous Connectivity Institute on ISED's  
Engagement on Spectrum and the Indigenous Priority Window**

## **Introduction**

The Indigenous Connectivity Institute<sup>1</sup> (ICI), an initiative of Clear Sky Connections, appreciates the opportunity to submit comments in response to the Innovation, Science, and Economic Development's (ISED's) national engagement on the "Indigenous Priority Window Spectrum Policy Framework."

In its initial comment, the ICI called on ISED to:

1. **Equip individual Indigenous community members with the know-how to meaningfully participate in spectrum talks:** By leveraging the extensive spectrum/IPW educational resources developed by ISED, we are communicating essential information about spectrum and the draft IPW to a broad audience of First Nations, Inuit, and Métis community members and Indigenous leadership.
2. **Create pathways for individual Indigenous voices to be heard,** while also amplifying the collective message of the Indigenous digital equity movement: We are hard at work integrating individual-level and community-level feedback from various channels, including Spectrum Sovereignty Summit table talk insights and individual survey responses. Noting the importance of meeting communities where they already are, we are also teaming up with existing online Indigenous discussion spaces to host semi-structured group dialogues.

These insights were gleaned from the ICI's Summit on Spectrum Sovereignty, held in Ottawa on February 22, 2024.

The ICI's policy agenda and policy priorities are developed through an iterative process that includes ongoing communication and discussion with the ICI community, such as at the Indigenous Connectivity Summit (ICS) and other events such as the Summit on Spectrum Sovereignty. At the annual ICS, delegates collaborate on and endorse a set of Calls to Action.<sup>23</sup> If implemented, these Calls to Actions would result in a policy and funding environment that is conducive to First Nations, Inuit, and Métis

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<sup>1</sup> The Indigenous Connectivity Institute (ICI) works to advance internet connectivity in Indigenous communities in the United States and Canada. It does this through training and cultivating knowledge, providing grants to Indigenous broadband networks, and convening a movement of Indigenous broadband advocates at the annual Indigenous Connectivity Summit. Led by an advisory committee of leaders in the Indigenous connectivity space, the ICI supports Indigenous communities to build a digital future on their terms. The initiative is hosted by Clear Sky Connections, an Indigenous-owned non-profit based on reserve land in Winnipeg, Manitoba. <https://indigenousconnectivity.org/>

<sup>2</sup> 2023 Calls to Action: <https://indigenousconnectivity.org/2023-indigenous-connectivity-summit-calls-to-action>

<sup>3</sup> 2022 Calls to Action: <https://indigenousconnectivity.org/2022-indigenous-connectivity-summit-calls-to-action>



communities driving their own connectivity solutions that are community-led, operate for the benefit of the community, and strengthen sovereignty while contributing to socioeconomic welfare.

For several years, the Calls to Actions have addressed Indigenous access to spectrum. These Calls to Action comprise the ICI's position on spectrum policy in Canada and represents our vision for how spectrum is allocated, managed, and used. In 2022, the delegates to the ICS endorsed the following:

1. We call on the Governments of Canada and the United States to acknowledge that Indigenous Peoples have myriad needs for the natural resource called electromagnetic spectrum ("spectrum"), including but not limited to climate change monitoring and modeling, food sovereignty and security, health and safety, especially pertaining to missing and murdered Indigenous people, mental health and wellness, emergency management, education, economic development, revenue, and other priorities.
2. We call on the relevant departments to immediately stop selling spectrum licences and renewing permits on Indigenous traditional territories, and to acknowledge Indigenous rights to govern and manage the spectrum on and over their lands.
3. Furthermore, those departments should promptly and unconditionally release unused spectrum licences on and over Indigenous traditional territories for the use by and benefit of Indigenous Peoples.
4. If Indigenous leadership chooses not to manage spectrum in their traditional territories, we call on federal governments to do so on the community's behalf and turn over any potential revenue resulting from the use of that spectrum back to the community.
5. We call on relevant government departments to conduct meaningful public consultation with Indigenous governments, community members, and mandated organizations on a recurring basis to discuss whether Indigenous needs for spectrum are being met. Governments should work with the mandated organizations in each traditional territory to find a mutually-beneficial path forward.
6. We call on the Canadian and United States governments to take this action with the full collaboration of and engagement with, and accountability to, Indigenous Peoples and the public.

In 2023 the delegates to the ICS built upon the previous year's Calls to Action, stating:

1. We call on the governments of Canada and the United States to allocate a portion of funds raised through spectrum auctions and spectrum licence renewals to fund an Indigenous office of telecommunications policy that would co-manage with relevant government departments and agencies on issues that affect Indigenous Peoples, communities, and lands:
  - a. This includes the spectrum allocation process, and the development, delivery, and evaluation of federal funding programs (for example, BEAD in the United States, and the Broadband Fund in Canada).
2. We call on the governments of Canada and the United States to follow the Government of New Zealand's lead and provide a spectrum set aside for Indigenous Peoples to use on their own lands and territories at no cost. Furthermore, we call on governments to follow New Zealand's

lead and provide capital and operational funding to the aforementioned Indigenous office of telecommunications policy to ensure Indigenous Peoples can effectively utilize that spectrum for the educational, economic, and social wellbeing of their communities.<sup>4</sup>

While we recognize the Government of Canada is likely unprepared to fully implement the above Calls to Action, we urge it to work with relevant Indigenous governments and organizations to co-create a plan to do so.

At the same time, the ICI does recognize that the upcoming Indigenous Priority Window is a step in the right direction for Indigenous communities. As such, the ICI is committed to ensuring the IPW is a success, and contributes to eliminating the connectivity gap that persists between Indigenous communities and mainstream Canada.

Canada is not the first state to embark on a process involving spectrum and Indigenous Peoples. Therefore, Canada has an opportunity to learn from similar processes such as New Zealand's Memorandum of Understanding with the Māori Spectrum Working Group and the Federal Communications Commission's Tribal Priority Window in the United States.

### 3.1 Policy objective

***ISED asks "Do you agree with the stated policy objective in section 3.1? If not, how should it be modified?"***

ISED's stated policy objective is a welcome step in the right direction relative to Crown-Indigenous relations. However, it does not recognize the inherent rights of Indigenous Peoples as codified in Section 35 of the Constitution Act, 1982, Treaties and Land Claim Agreements, as have been upheld in numerous court decisions, and as they have been affirmed in Article 26 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP),<sup>5</sup> and as enacted through Bill C-15 in Canada. Article 26 states:

1. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.
2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.

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<sup>4</sup> This Call to Action is echoed in Recommendation 60 in the National Indigenous Economic Strategy: "Prioritize provision of broadband services in rural and remote communities; set aside telecommunications spectrum for Indigenous communities, and report annually on progress in meeting connectivity goals.

<sup>5</sup> Article 26

3. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.
4. Indigenous Peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.

Spectrum is a natural resource,<sup>6</sup> and its use over Indigenous lands and territories with the exclusion of the rights of Indigenous Peoples contravenes Article 26. The Government of Canada, through ISED, must recognize Indigenous rights to spectrum on and over their lands and traditional territories.

***ISED asks “How can we measure the success of the IPW spectrum policy framework?”***

We suggest the success of the IPW can be measured in two ways:

1. **Number of communities reached.** At the core of the framework is the goal of increased engagement with Indigenous communities throughout Canada. To move from meaningful engagement to meaningful relationship with Indigenous communities will result in the most positive outcome of the spectrum policy framework. The more ISED and the Government of Canada are in relationships based on mutual respect with Indigenous communities and organizations, the more successful these projects will be. Success starts with a significant number of applications to the program.

The FCC’s TPW in the United States had close to a 74 percent application rate despite the fact that many Tribes were ineligible, so we can assume the application rate for the IPW should be higher.

2. **Deployments completed within a timeframe.** While buildout requirements may impose constraints on communities utilizing their spectrum, evaluating projects after a set period can indicate the program’s success. Unforeseen challenges will likely arise, but addressing them in real time [through on-going measurement and analysis] can contribute to success through awareness and timely response.

***ISED asks “How would you like to see the IPW spectrum policy framework used in the future?”***

The MOU between the Government of Aotearoa-New Zealand and the Māori Spectrum Working Group creates an obligation on the part of the government to set aside 20 percent of available spectrum for use by the Māori in perpetuity. This is in addition to the 25 percent of the mid-band spectrum (3.4–3.8 GHz) previously made available to them. The MOU does not create a one-off transfer. We advise ISED does not consider the IPW to be a one-off transfer, and ensures that First Nations, Inuit, and Métis have priority access to all future available spectrum.

Furthermore, the New Zealand MOU allows the Māori to benefit from the spectrum that rightfully belongs to them, even if they choose not to use it. They can realize these rights through revenue generated by the Government of Aotearoa-New Zealand, which sells the asset on their behalf.

We understand that the IPW does not create a specific percentage carve-out for Indigenous Peoples like the MOU does in New Zealand. As such, a similar arrangement is not included in the Framework. However, as inherent rightsholders, Indigenous communities are due benefits from this use of a natural

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<sup>6</sup> <https://ised-isde.canada.ca/site/communications-research-centre-canada/en/what-spectrum>

resource, such as through Resource Revenue Sharing Agreements.<sup>7</sup> As stated above, the 2023 ICS Calls to Action call on the Government of Canada to allocate a portion of funds raised through spectrum auctions and spectrum licence renewals to fund an Indigenous office of telecommunications policy that would co-manage spectrum with relevant government departments and agencies on issues that impact Indigenous Peoples, communities, and lands. This new coordinating body would work with ISED, CRTC, and Indigenous Services Canada (ISC) on issues such as “spectrum allocation process, and the development, delivery, and evaluation of federal funding programs.”

This proposed office presents an opportunity for ISED to coordinate further with other digital equity stakeholders such as the CRTC and ISC. With the efforts toward truth and reconciliation, all Canadian government departments and agencies focused on digital equity must prioritize Indigenous communities to meet stated goals and can do so more effectively through increased cross-department cooperation and coordination with one another. The values and efforts of the framework are with merit.

***ISED asks “Are there any other spectrum access measures we should consider to further support Indigenous connectivity?”***

To ensure the IPW and future Indigenous spectrum set-asides are successful, the ICI calls upon ISED to work with other relevant ministries and commissions (in particular ISC and the CRTC) to:

1. **Ensure adequate funding is available to deploy and sustain Indigenous-owned networks** by working with the CRTC and ISC to ensure there is an Indigenous-specific fund to support the deployment and ongoing sustainable operation of Indigenous-owned networks.
2. **Develop an Indigenous workforce in IT** by working with relevant and qualified organizations and government departments to strengthen the capacity of Indigenous Peoples to build, manage, and maintain networks. While building a technical workforce is crucial to the success of the IPW, capacity building efforts should also include the necessary skills that are needed to operate a network, such as project management, governance, finance, human resources, business management, and so on.

***Adequate and Sustainable Funding***

Telecommunications funding program frameworks in Canada are failing Indigenous Peoples. Funding program criteria do not respect the rights of Indigenous Peoples, are not structured in a way that is inclusive, and do not ensure their meaningful participation. In fact, the criteria for accessing funding from the CRTC’s Broadband Fund effectively exclude many Indigenous communities and organizations from applying. The CRTC itself recognized this reality in its 2018 *Telecom Regulatory Policy CRTC 2018-377*, which found “requirements that are too onerous may preclude small applicants from being able to apply for funding from the Broadband Fund.”

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<sup>7</sup> <https://redpaper.yellowheadinstitute.org/part-three-recognition/>



The 2023 ICS Calls to Action address this issue:

“We call upon the governments of Canada and the United States to establish a dedicated fund to provide operational support (OPEX) to qualifying Indigenous-owned networks, as the likelihood of financial sustainability of many networks in small, isolated Indigenous communities is low. To ensure these networks can continue providing a much-needed service to community members, operational support is imperative.”

Therefore, providing access to OPEX is crucial to the success and sustainability of certain networks. The mechanisms and criteria to define how OPEX funding would be distributed should be developed in partnership with relevant Indigenous-led organizations and experts. This is also supported by the National Indigenous Economic Development Board’s *National Indigenous Economic Strategy for Canada*,<sup>8</sup> which calls on the Government of Canada to:

“80. Enable federal and provincial co-funding and industry partnerships to provide broadband services to Indigenous communities in rural and remote areas; prioritize Indigenous participation; provide dedicated Indigenous funding for all major infrastructure programs and projects, including Indigenous ownership.”

Therefore, we call upon ISED to work with the CRTC, ISC and other relevant ministries and departments to ensure an Indigenous-specific funding stream to build, operate, and maintain networks is made available to coincide with the release of spectrum licences granted through the IPW. This funding stream must cover both capital and operating costs, and be based on criteria that are developed in collaboration with Indigenous technical organizations and governments.

### *Capacity Building*

The ICI and the Internet Society (ISOC) have been supporting Indigenous communities in North America to gain access to affordable, high-quality Internet service since 2017. This includes grants to deploy small scale networks, known as community networks. One of the most significant barriers we have faced has been the inability to scale these efforts to meet the needs due to a lack of a qualified Indigenous workforce in networking and IT.

As Canada seeks to address immediate and long-term labour force shortages due to an aging population and the rapidly evolving digital economy, Indigenous people and, more specifically, Indigenous youth—as one of the fast growing demographics in Canada—are well positioned to be key contributors in meeting and overcoming these workforce challenges.

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<sup>8</sup> National Indigenous Economic Development Board, *National Indigenous Economic Strategy for Canada*, 2022, [https://niestrategy.ca/wp-content/uploads/2022/12/NIES\\_English\\_FullStrategy\\_2.pdf](https://niestrategy.ca/wp-content/uploads/2022/12/NIES_English_FullStrategy_2.pdf)



To address this barrier, in early 2024 the ICI launched the Nalukataq project – a multi-year Indigenous workforce development strategy. The overarching vision of the Nalukataq project is to build or strengthen community (holistic) capital and/or improve socioeconomic welfare for urban, rural, and remote Indigenous communities. This will be achieved through developing an Indigenous workforce that can reduce the digital divide for their communities while enhancing community/collective capacity and filling a growing workforce gap in network design, implementation, and management.

Other Indigenous organizations, including the First Nations Technology Council (FNTC), are also actively engaged in building Indigenous capacity in the IT sector. To scale up these capacity building efforts, we call on the Government of Canada to act upon the following recommendations from the National Indigenous Economic Strategy:

“17. Direct Federal funding to Indigenous enrolment in post-secondary STEM disciplines.

18. Partner with organizations focused on Indigenous STEM programs.”<sup>9</sup>

We recommend ISED and other government agencies and departments support relevant Indigenous organizations to design, develop, and deliver a comprehensive, focused training initiative to advance and enhance Indigenous Peoples’ stakes in culturally appropriate digital equity programming. Above all, these initiatives must be led by Indigenous people and organizations.

There is international precedent for this. In 2022, the Government of Aotearoa-New Zealand provided NZD \$17.8 million (CAD \$15.1 million) to fund the development of increased technical and digital skills training access amongst the Māori population, recognizing that capacity building would be key to the effective utilization of the spectrum set aside as part of its MOU with the Māori Spectrum Working Group.

## 2. Eligibility Criteria:

***ISED asks “Does the existing applicant-based option (Option 1), as defined in section 3.2, resonate with you? If so, which parts do you think are the most valuable to use to create the final eligibility criteria?”***

***ISED asks “Does the community support-based option (Option 2), as defined in section 3.2 resonate with you? If so, do you think it should be combined with Option 1 or should it stand on its own?”***

***ISED asks “Does the project-based option (Option 3), as described in section 3.2, resonate with you? If so, which parts do you think are the most valuable to use to create the final eligibility criteria?”***

The ICI supports both Options 1 and 2, individually or a combination of them both. It is important to have clear support from the Indigenous community whose lands the spectrum is covering.

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<sup>9</sup> National Indigenous Economic Development Board, *National Indigenous Economic Strategy for Canada*, 2022, [https://niestrategy.ca/wp-content/uploads/2022/12/NIES\\_English\\_FullStrategy\\_2.pdf](https://niestrategy.ca/wp-content/uploads/2022/12/NIES_English_FullStrategy_2.pdf)



However, we have reservations with Option 1. Many organizations who serve and are based in Indigenous communities may not be registered. These organizations should not be disqualified due to their lack of visibility by the Canadian government. For example, the ICI has been working with North End Connect, an Indigenous, community-based organization based in Winnipeg that is deploying a mesh network to service an socioeconomically disadvantaged area of the city with a high Indigenous population.

Moreover, new Indigenous organizations are being formed to provide internet accessibility services to Indigenous communities, as they have so long gone without. These too run the risk of not being qualified in Option 1. Option 2 provides opportunities for Indigenous communities to have a voice in the process and who they work with.

***ISED asks “What eligibility criteria should we consider for IPW applicants?”***

The connectivity gap faced by many Indigenous people living in Canada is not strictly due to geography. Urban areas with high Indigenous populations, such as the North End of Winnipeg, Ottawa, Edmonton, Vancouver, and other cities<sup>10</sup> are frequently characterized as digital deserts. Neighbourhoods like the North End experience racism, crime, poverty, homelessness, exclusion, and marginalization, and as such would greatly benefit from high quality, affordable Internet access. For this reason, we oppose any approach that focuses solely on location, as it fails to address the systemic issues faced by Indigenous people/communities in urban areas. We also support an approach that gives Indigenous communities control over who acquires spectrum over their lands.

This connectivity gap is exacerbated by factors that are outside of the purview of this consultation, but include the need for access to devices to access the Internet and enhanced digital literacy skills.

### **3. Time-limited Window**

***ISED asks “The proposed time-limited window is 12 months (section 3.3). Do you feel this is sufficient time to submit a licence application? If not, how much time would be sufficient?”***

In the United States, the TPW was open from February 3, 2020 to September 2, 2020. During that time , 420 applications for a 2.5 GHz licence were received by the FCC. However, in a discussion at the 2024 Indigenous Connectivity Summit, delegates noted that “many nations missed the window not understanding the value of spectrum.”

While a time-limited window to submit applications of one year may be sufficient for some Indigenous organizations and communities in Canada, the reality is that many do not yet recognize the value of spectrum. Therefore, ISED should work with Indigenous organizations to conduct a comprehensive

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<sup>10</sup> 23.6% of the 72,780 North End residents were Indigenous, while Indigenous Peoples make up only 12.5% of the total population of Winnipeg.



awareness raising campaign about the value of spectrum, why it's important, and why organizations and communities should apply for a licence ahead of the opening of the IPW.

Furthermore, the 2023 ICS Calls to Action call on governments “to make comment procedures and consultation processes more accessible by ensuring consultation deadlines take into account the unique realities of many Indigenous communities, such as harvesting season and other traditional and cultural practices.” The same applies to the IPW - the window to submit applications should be designed in collaboration with Indigenous-mandated organizations. As an example, the deadline for comments for this consultation on the IPW framework is the day after the National Day for Truth and Reconciliation.

#### **4. Conditions of Licence:**

***ISED asks “How can the conditions of licence described in section 3.4 be designed for future spectrum access initiatives to support Indigenous-led connectivity solutions?”***

Successful applicants to the FCC’s Tribal Priority Window have several interim performance deadlines to meet in order to keep their 2.5 GHz licence. The first deadline is in October 2024 for more than 150 licencees, four years after the date of the initial licence grant. This initial deadline can be met in one of two ways:

- “licencees providing mobile or point-to-multipoint service must demonstrate reliable signal coverage of 50% of the population of the geographic service area within four years of initial licence grant; or
- licencees providing fixed point-to-point service must demonstrate operation of one link for each 50,000 persons in the geographic service area within four years of initial licence grant.”<sup>11</sup>

Many Tribes have either already installed the minimum requirement or are on track to do so. In the US, we have heard about equipment shortages as a result of demand spurred by the TPW. Several Tribes would not have met this deadline without the support of non-governmental actors who were able to secure equipment at low or no cost to them. Fortunately, Tribes that fail to meet the initial deadline do not lose their licence, however, the time to their second deadline is shortened accordingly. ISED should heed from the TPW’s roll-out to ensure the same shortages do not happen in Canada.

As stated above, a lack of capacity in Indigenous communities to build, operate, and manage networks is a barrier to ending the connectivity gap. Timeframes for deployments utilizing spectrum allocated through the IPW must consider the time required to train Indigenous people to perform the work.

These timelines could be accelerated by investments into culturally appropriate, community-based training.

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<sup>11</sup> FCC, Guidance to 2.5 GHz Rural Tribal Priority Window licencees on Demonstrating Compliance With Interim Performance Requirements, April 4, 2024, <https://www.fcc.gov/document/25-ghz-tribal-licencee-interim-performance-guidance-pn>

A stated objective is “to reduce barriers to spectrum access.” To achieve this, ISED should follow the precedent set by the Federal Communication Commission’s (FCC’s) Tribal Priority Window (TPW), that there should be no cost to accessing the proposed bands of spectrum, as well as spectrum available in the future. The FCC’s TPW can lend some of its success to the fact that there was no cost to Tribal Nations to apply for the spectrum. Charging any amount adds an additional and likely insurmountable burden to the applicant.

## 5. Engagement:

*ISED asks “Should we consider other platforms to engage with Indigenous partners to advance economic reconciliation?”*

It is important to note that Indigenous Peoples are not mere stakeholders in this process. Rather, Indigenous Peoples are sovereign and inherent rights-holders, as codified in Treaties and Land Claim Agreements, as have been held up in numerous court decisions, and as have been codified in international law in Article 26 of the Universal Declaration on the Rights of Indigenous Peoples (UNDRIP),<sup>12</sup> and put into effect in Canada through [Bill C-15](#), including governments’ responsibilities to ensure the rights stated above are respected and carried out.<sup>13</sup>

The ICI answered a similar question in its response to the CRTC’s “2023-89 Call for Comments – Broadband Fund Policy Review”,<sup>14</sup> where we suggested government agencies and departments work

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<sup>12</sup> Article 26

1. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.
2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.

<sup>13</sup> Relevant Articles include:

**Article 3:** Indigenous peoples have the right to self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development.

**Article 4:** Indigenous peoples, in exercising their right to self-determination, have the right to autonomy or self-government in matters relating to their internal and local affairs, as well as ways and means for financing their autonomous functions.

**Article 18:** Indigenous peoples have the right to participate in decision-making in matters which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own indigenous decision-making institutions.

Article 19: States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them.”

Article 32.2.: States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization, or exploitation of mineral, water or other resources.

<sup>14</sup>

<https://applications.crtc.gc.ca/ListeInterventionList/Documents.aspx?ID=317531&en=2023-89&dt=i&lang=e&S=C&PA=t&PT=nc&PST=a>



through existing, trusted organizations engaged in the digital equity spaces, such as the First Mile Connectivity Consortium (FMCC), First Nations Technology Council (FNTC), and the Indigenous Connectivity Institute (ICI). ISED should also send delegations with members of appropriate status/rank to major events like the ICS, both to actively listen and to hold bilateral consultations.

Furthermore, the 2022 ICS Calls to Action state:

- “We ask that funding opportunities include ongoing support for financially compensated digital navigators in Indigenous communities, similar to the support that Environment and Climate Change Canada provides for the [Indigenous Guardians program](#). Digital navigators can help facilitate outreach, digital literacy, and awareness required as internet access is introduced and expanded within communities, as well as contribute local data for monitoring and evaluation of funded infrastructure and services and policy engagement.”

Digital navigators are qualified community members who assist people in their communities—youth, elders, those with disabilities, and so on—with internet adoption, as well as with safe and effective device use. In the United States, the National Digital Inclusion Alliance (NDIA) manages a network of digital navigators. The NDIA’s National Digital Navigator Corps includes Tribal Digital Navigators who are Indigenous persons working in their communities as digital navigators.

The ICI recommends ISED work with the CRTC and ISC to explore the potential of a network of digital navigators in Indigenous communities. If such a program were implemented, a digital navigator could be the point of contact to communicate information about government programs/initiatives, services and funding opportunities.

In practical terms, the use of plain language in all communications will be paramount to the success of the program. There is no need to over complicate the technical aspects of spectrum allocation and/or management.