



North End Connect

Submission to ISED Canada

Engagement Period Re: Indigenous Priority
Access Window (IPW) Draft Policy Framework

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Introduction

Background

1. This submission reports on a collaborative community engagement project which aimed to gather essential feedback on the Indigenous Priority Access Window (IPW) draft policy framework.
2. The insights within are the cumulative result of several months of engagement with First Nations, Métis, and Inuit participants who have a vested interest in Indigenous digital equity and digital futures. Led by Indigenous project officers, the engagement process spanned several key events hosted by our friends at the Indigenous Connectivity Institute (ICI), including the Spectrum Sovereignty Summit, the Indigenous Connectivity Summit (ICS), and the youth Indigenous Leadership in Policy Advocacy (ILPA) fellowship gathering.

Overall Community Impressions of the IPW

3. Overall, the Indigenous Priority Window (IPW) has been well-received by the participants we engaged. Participants, Indigenous youth in particular, have expressed enthusiasm for the policy and a strong desire to see it implemented.
4. With this in mind, participants also strongly emphasized the need for ongoing involvement in the policy's development and execution following this engagement period. There is a clear expectation that ample opportunities will be provided for Indigenous communities to co-monitor and co-develop the IPW policy as it unfolds. In alignment with the Indigenous Connectivity Summit calls to action, this collaborative management approach is absolutely crucial for continued buy-in from the community. Indigenous community members expect ISED to seek continuous IPW feedback moving forward and make adjustments based on what is and is not working in practice.

Context-Setting

Participant Overview

5. This collaborative community engagement project involved a diverse group of participants, primarily composed of First Nations, Métis, and Inuit (FNMI) individuals. Participants self-selected based on their interest in equitable broadband connectivity and Indigenous digital futures.
6. Throughout 2024, project officers and community members collaboratively gathered input at key in-person and virtual events. These events included the Spectrum Sovereignty Summit, the Indigenous Connectivity Summit and pre-summit online policy training seminars, and the Indigenous Leadership in Policy Advocacy (ILPA) fellowship gathering. The ILPA gathering specifically enabled the inclusion of youth perspectives from participants aged 18-35.
7. Membership in the participant group fluctuated in number over the project period. Some individuals were consistently a part of the “core” participant

group, while others were present for one or two events. Overall, the several dozen unique participants we engaged represented a breadth of expertise and experiences, including:

- Community leaders
- Network and telecom professionals
- Policy experts
- Academics and researchers
- Elders
- Students
- Parents
- Members of civil society

8. In addition to focus group-style roundtable discussions, the project gathered input via written commentary, semi-structured interviews, and group collaborative writing sessions. This multi-pronged approach allowed for both structured and open-ended feedback. As well, it offered multiple opportunities for participants to add to their initial input, as their understanding of spectrum deepened over time through participation in ICI-led programming.

North End Connect and Urban Indigenous Digital Divides

9. North End Connect (NEC) operates from an urban Indigenous community perspective. While most urban centers in North America generally have access to quality high-speed Internet connectivity, often in low-income pockets of these same cities there are neighbourhoods where majority-Indigenous residents cannot afford or have other barriers to accessing technology and Internet based resources. The North End of Winnipeg is one of those places. NEC aims to identify specific needs and create local resources to overcome these digital divides. This project is a collective effort of several local community groups, technical experts, and researchers.
10. All participating groups in NEC's efforts share the belief that there is a problem with their clients' abilities to access and safely utilize online resources and services. Something needs to be done about it. Research

shows that local community network projects can work to address both the technical and human constraints, and even provide some local economic development along the way.

11. In September 2024, a community-based research team led by Joel Templeman (Internet Society Manitoba Chapter) published *Barriers to Meaningful Connectivity Exploring Internet Access Options in a Low-Income Urban Neighbourhood*. This comprehensive study is crucial literature for the field of digital equity and essential reading for all government entities involved in telecommunications, infrastructure, and Indigenous interests. For the IPW policy team, NEC highly encourages you to spend considerable time with this study and take action to incorporate the insights into the IPW framework. From the abstract:
12. *“Community networks risk failure when they attempt to emulate models from elsewhere without engaging the community in the process and making appropriate adaptations. These ‘build it and they will come’ models rarely work over the long term. This research project explored claims from residents of a low-income neighbourhood in the “North End” of Winnipeg in Manitoba, Canada, that inadequate and unaffordable Internet connectivity limits their access to critical communication tools, resources, and information. Through the research, we identified the need for a sustainable model of affordable, accessible Internet connectivity that centers on building a cooperative-owned and operated community network with Indigenous and newcomer families at its heart. Findings revealed that high connectivity costs, limited digital literacy, and inadequate infrastructure are the primary barriers to meaningful connectivity in the community.*

The intent of the “North End Connect” research project was to work directly with the residents, to learn about their connectivity needs and wants, inform the project’s technical team as to how and where to build a solution that works for the community, removing explicit and implicit barriers to access. Through our research, we validated that digital connectivity is a problem in the community. Utilizing a CBPAR approach provided a more nuanced understanding of the barriers to access from the resident’s perspective and lived experience. This allowed for the development of a strengths-based roadmap that utilized existing assets to provide affordable, accessible, trustworthy, and secure Internet access to anyone who wants it. The research acted as the catalyst to motivate the community and led to ongoing interventions aimed at addressing

each of the identified barriers. As we investigate these barriers, it becomes evident that addressing these issues is not just a matter of technological access but a crucial step toward fostering a more inclusive and equitable society. The project serves as a model for community-driven digital inclusion efforts and contributes to global conversations about equitable access to the internet.”¹

Situating IPW Feedback Within Community Members’ Perspectives

13. This section seeks to frame for the IPW policy team how Indigenous community members of various backgrounds perceive and interpret key terms used in government policy, particularly in relation to the IPW.
14. The following commentary was co-developed in real time with participants who joined the ICI’s pre-ICS policy training series. The below perspectives shed light on the meanings, connotations, and associations these terms evoke for the intended audience of the IPW framework and engagement mechanisms. The aim is to help bridge the gap between policymakers’ intentions and Indigenous community members’ interpretations of the IPW framework.
15. *Policy feedback:* There is a strong sentiment that meaningful feedback requires direct, in-person engagement within communities. The historical approach to obtaining feedback from Indigenous peoples is viewed as inadequate, with COVID-19 exacerbating the issue by promoting less personal communication methods. Communities call for a shift from extractive feedback methods to a more community-owned process, ensuring information isn’t misrepresented and the process becomes decolonial.
16. *Spectrum:* Over recent years, there has been a growing recognition that spectrum is a natural resource. The Indigenous perspective often differs from the colonial view, seeing natural resources — spectrum included — as having spirit and being integral to living in a good way, not simply commodities to be extracted.

¹ Templeman, J., Anderson, S., & MacKenzie, S. (2024, September 26). *Barriers to Meaningful connectivity: Exploring internet access options in a Low-Income urban neighbourhood*. <https://openjournals.uwaterloo.ca/index.php/JoCI/article/view/5601>

17. *Rights-holder vs. stakeholder:* Indigenous peoples are rights-holders with constitutionally protected and inherent rights. There is a major distinction between rights-holders and stakeholders; Indigenous peoples shouldn't be treated as merely another competing interest on the same level as an entity without such rights, nor should they have to continuously re-prove the existence of their rights. Respecting the rights-holder framework should not require explanation or justification — it just “is”.
18. *Indigenous co-management:* This concept involves policymakers entrusting decision-making authority to Indigenous peoples, emphasizing shared responsibility rather than total government control.
19. *Indigenous community:* Where an Indigenous community is geographically situated, and the scope of their traditional lands, are each highly relevant to spectrum management. Urban Indigenous communities are another distinct, but legitimate, form of Indigenous community that are often overlooked in government engagement processes. Indigenous communities now also exist in the virtual sense on online platforms, and are often focused on particular identity pillars (e.g. Indigenous beading circles on Facebook). Policymakers should seek to learn and understand the diversity, multiplicity, and complexity of Indigenous communities.
20. *Advocacy:* The action of advocating involves empathy, compassion, courage, and community encouragement. It's about being a voice with the people, sometimes for the voiceless, addressing issues based on lived experiences.
21. *Public Policy:* Rules and regulations that the government is held accountable for fulfilling. It includes recommendations put forward by people to address certain matters or issues and solutions that benefit the community.
22. *Policymaker:* There is a perception of policymakers as somewhat disconnected from community realities, struggling to understand context and often lacking awareness of actual situations in communities.
23. *Consultation:* This word is viewed as loaded due to its historical negative connotations. There is frustration with decades of superficial consultation processes. Instead, Indigenous community members are calling for meaningful, ongoing relationships as an alternative to “going through the motions”. The term “having a relationship” is preferred over “consultation” as

it is seen as more likely to yield sustainable, positive outcomes for Indigenous peoples.

Details of Community Feedback: IPW Draft Policy Framework

Eligibility Criteria

24. *Equity-Focused Approach*

The most common point of input involved a tiered approach prioritizing Indigenous communities with the greatest need. This could involve developing a formula that groups applicants based on factors such as current connectivity status, remoteness, community size, etc. Some suggested focusing exclusively on specific factors, such as the severity of the community's digital divide, or targeting specific communities under certain circumstances. For instance, IPW could target urban Indigenous communities who are highly underserved by telecom companies, or target communities where infrastructure has been compromised by climate disasters like forest fires or floods.

25. *Federal Recognition*

Some participants proposed that corporate/telecom eligibility should be exclusively extended to companies listed on the Indigenous Business Directory (IBD) managed by ISED. Regarding communities as applicants, some suggested that federal recognition of First Nations bands (when applicable, outside of an Inuit/Metis context) should be a required factor.

26. *Community Mandate*

There was significant emphasis on the importance of community support. One suggestion was to require applicants to demonstrate support from the leadership of at least one community in order to access the IPW. For First Nations bands, this could be demonstrated through a mandate resolution passed by the chief and council. However, opinions varied on this point, with some arguing that chief and council approval should be favorable but not mandatory, allowing room for traditional or hereditary structures and participation from Indigenous individuals and civil society organizations.

27. *Eligibility for Urban Indigenous Communities*

Urban Indigenous communities face some of the highest barriers to connectivity in society and must not be left out of the IPW's approach. One major challenge for addressing the needs of urban Indigenous peoples with the IPW is that the administration of services leans heavily on civil society rather than administrative groups with a formal mandate, in contrast with on-reserve communities or regional Indigenous governments (e.g. Manitoba Metis Federation). Exclusively rooting IPW eligibility in band council or equivalent authority will leave urban Indigenous people on the fringe of any connectivity solutions that emerge from control over spectrum. Eligibility must adapt to the local context, and one way to do this is to leverage civil society already working in the digital divide space. Existing local community network projects like North End Connect operate at the pleasure of the community and are well versed in the unique circumstances of the local digital divide, and can help ensure the IPW framework does not leave out urban Indigenous peoples.

28. *Shared Decision-Making Authority*

An innovative proposal suggested entrusting Indigenous land and resource rights-holders themselves with the authority to determine IPW eligibility, reflecting their status as the rightful owners of the spectrum that flows over their lands.

29. *Verified Community Connection*

There was a general consensus that a verified connection to an Indigenous community is vital for any applicant. Some suggested that claims such as familial ties to specific communities should be expressly validated and not taken at face value.

Application Timeline

30. The discussions surrounding the timeline for applications did not yield a clear-cut time period. Instead, the general takeaway emphasized the need for a dynamic and flexible timeline. This flexible approach to the application timeline reflects an understanding of the diverse needs and capacities of Indigenous communities, ensuring that the IPW remains accessible and equitable for all potential applicants.

31. *Responsive Scheduling*
The timeline must be responsive to the changing needs of communities. There is only so much local capacity that can be diverted to yet another government program application, even amongst the Indigenous private sector. For instance, communities may require more time if the application period coincides with hunting seasons, important ceremonies, other government funding/program application periods, or when community leadership is occupied with significant local or regional events.
32. *Equitable Opportunity*
Participants stressed that some communities will be able to rapidly mobilize to apply, while others will require a significant period of lead time. Neither should be penalized for these capacity realities. Both the rapid-responding and slower-responding communities must have equal opportunities to take advantage of the IPW.

Potential for Positive Impact

33. *Education, Training, and Employment*
Many participants highlighted that spectrum access could significantly impact their communities by providing more opportunities for Information and Communication Technology (ICT) job growth within communities. This is particularly important for areas currently dealing with brain drain and limited availability of decent work for youth. Participants anticipate significant opportunities for in-community training and education, both in ICT and in other sectors enabled by ICT (e.g., remote learning). They expect this to result in increased employment and educational attainment. It represents the capacity for spectrum access and control to promote digital self-determination, allowing communities to listen and respond to the needs of their youth in ways that incumbent telecom companies cannot.
34. *Innovation and Economic Development*
Participants envisioned a positive feedback loop: access to spectrum leads to better local connectivity, which in turn fosters growth in the local ICT sector. This growth enhances local understanding of wireless services' potential, greater demand for these spectrum-enabled services, and ultimately results in an ever-developing usage of spectrum as local actors respond.

35. *Alternative Connectivity Solutions*

The IPW policy introduces a vital alternative for communities caught between extremely expensive fiber builds and reliance on non-Indigenous mobile/satellite providers with no stake in the community's needs or wellbeing. With community-based spectrum control, local actors are empowered to direct and determine their own connectivity solutions that make the most sense for their context.

Challenges to Consider

36. *Means to Secure Spectrum Licenses*

A prevalent concern among participants was the ability to secure adequate funding for spectrum licenses during the IPW application period. There is a persistent need in general for increased telecom funding that is exclusively accessible to non-incumbent entities.

37. *Usefulness of Available Spectrum Bands*

Many participants expressed the need for spectrum available through IPW to be reasonably suitable for current and future technologies, not merely outdated frequencies that no one else in the sector sees a use for.

38. *External Funding Constraints*

Participants highlighted that while funding for projects can in general be difficult to obtain, even when secured these external funding sources often introduce additional challenges:

- **Conflicting Priorities:** What funders want is not always what the members of the community want — but the funder's requirements will always win because of the power dynamic at hand.
- **Third-Party Control:** The power dynamic discussed above can impose constraints on the Indigenous self-determination aspect that spectrum access would otherwise provide, restricting the community's vision and long-term plans in favour of carrying out the strategic objectives of a third party funder.
- **Limited Scope:** Funding agreements often promote conservative spending and exclude important sustainability elements like infrastructure overbuilding, collaborative planning, youth engagement

and involvement, education and training, and other key activities, despite communities desiring these aspects of the project for future-proofing purposes. The benefits of spectrum access and control are unnecessarily curbed under these circumstances.

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