



Innovation, Science and Economic Development Canada (ISED)

SPB-002-24

Improving Indigenous Access to Spectrum:  
Draft Indigenous Priority Window Spectrum Policy Framework

Submission by

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## **Introduction**

1. Sichuun welcomes the opportunity to respond to ISED's proposed Indigenous Priority Window Spectrum Policy Framework (the "Framework").
2. Sichuun's shareholders are the Naskapi Nation of Kawawachikamach, Nation Innu Matimekosh Lac John, and Innu Takuaikan Uashat mak Mani-utenam.
3. Sichuun provides fibre-based broadband, IPTV, VoIP, and LTE mobility services in the Kawawachikamach-Matimekosh-Schefferville region and surrounding areas.
4. Limited access to spectrum constrains the ability of Indigenous communities to develop and implement connectivity projects for their constituents and accrue socio-economic benefits related thereto.
5. Indigenous communities continue to lag behind most other regions of Canada in terms of access to broadband and mobility services, which in turn adversely impacts access to education, healthcare, and the ability to participate in the digital economy, while also presenting challenges to public safety.

## **Responses to Questions**

### **Question 1 – Policy objectives:**

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

- a. How can we measure the success of the IPW Spectrum Policy Framework?*
  - b. How would you like to see the IPW Spectrum Policy Framework used in the future?*
  - c. Are there any other spectrum access measures we should consider to further support Indigenous connectivity?*
6. While Sichuun agrees with ISED's stated policy objective to reduce barriers to spectrum access and support Indigenous applicants in accessing spectrum on a priority basis, dialogue is required to address the ownership and management of spectrum covering Indigenous lands, and revenues generated therefrom.
  7. The Framework's success can be measured by recording an increase in the number of Indigenous applicants and an increase in the number of projects deployed in Indigenous communities.
  8. Use of the Framework should be expanded to include all usable spectrum frequencies and not limited to only the 800MHz and 1900MHz.



9. Indigenous connectivity can be further supported by implementing a simple and fast-track process to transfer spectrum from incumbents to Indigenous communities, particularly in cases where incumbents have not deployed networks to adequately serve the communities, accompanied by access capital funding.

Question 2 – Eligibility Criteria:

*What eligibility criteria should we consider for IPW applicants?*

- a. *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?*
  - b. *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?*
  - c. *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?*
  - d. *Are there other approaches that may be better suited to create the final eligibility criteria?*
10. Sichuun does not support Option 1 on the grounds that would preclude any organizations who are not registered in Canada's Indigenous Business Registry, and it does not require community involvement or support, which is paramount.
  11. The community support-based approach proposed in Option 2 would ensure community involvement and decision-making based on a given community's priorities.
  12. Option 3 could potentially complicate a process that ISED is aiming to simplify.

Question 3 – Time-limited Window:

*The proposed time-frame window is 12 months (section 3.3). Do you feel this is sufficient time to submit a license application? If not, how much time would be sufficient?*

13. The proposed 12-month window to submit a license application is sufficient.

Question 4 – Conditions of License:

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

14. Given ISED's objective to remove barriers for Indigenous communities to deploy wireless connectivity solutions to address the significant gaps in broadband and cellular coverage,



and further given the high costs of deploying and operating such connectivity solutions in small, rural and remote Indigenous communities, any costs associated with acquiring spectrum should be nominal.

15. Deployment requirements should be flexible to account for the time it can take for an Indigenous community to develop, finance and deploy a connectivity solution.
16. Should an Indigenous license holder not deploy a connectivity solution, then the license holder should be required to work with other interested and qualified parties who are ready to deploy a viable connectivity solution.

Question 5 – Engagement:

*Should we consider other platforms to engage with Indigenous partners to advance economic reconciliation?*

17. A very limited number of Indigenous communities / entities have successfully deployed connectivity projects. In so doing, they have acquired a range of experience and knowledge which needs to be shared with other Indigenous communities. Supporting the creation of a grouping of Indigenous communities / entities focused on connectivity issues and closing the digital divide would enable the sharing of valuable knowledge and experience.
18. Holding regional conferences / information sessions would enable ISED to directly engage with under/unserved Indigenous communities and ensure that Indigenous communities / entities are well informed of all connectivity initiatives from the federal government.

Question 6 – Additional Comments:

19. Deploying mobility solutions involves multiple layers of costs. One such layer concerns setting up roaming infrastructure to enable inter-carrier connectivity for subscribers. It is prohibitively costly for small Indigenous mobility network operators to setup the required infrastructure to support roaming. Creating a common use roaming infrastructure platform exclusively for the use of such small Indigenous mobility network operators would enable subscribers to benefit from seamless coverage across Canada.