



Innovation, Science and Economic Development Canada  
Engineering, Planning and Standards Branch  
Senior Director, Space Services and International  
6<sup>th</sup> Floor, East Tower  
235 Queen St.  
Ottawa, ON.  
K1A 0H5

Reference: Canada Gazette, Part 1  
June, 2024  
Consultation on a Policy, Licensing and Technical Framework for Supplemental  
Mobile Coverage by Satellite  
SMSE-006-24

September 10, 2024.

Thank you for the opportunity for Build Nova Scotia, on behalf of the Government of Nova Scotia, to provide feedback on Supplemental Mobile Coverage by Satellites (SMCS). Expanding telecommunications services to all Canadians, particularly for business, emergency, and personal use, is crucial. The reluctance of national carriers to extend these services to Canada's most rural areas highlights the urgent need for improved access.

Referencing the *Spectrum Policy Framework for Canada* (SPFC) and *Canada's Digital Charter*, universal access is a clear requirement, which can be significantly aided by increased access to satellite coverage. Improved connectivity offers significant economic and social benefits, helping to close the communication and economic opportunity gap for low-income and rural communities.

Build Nova Scotia fully supports policy objectives aimed at expanding mobile services, promoting competition in wireless markets, enhancing the reliability and resiliency of telecommunications, and encouraging investment and innovation. However, the current situation is concerning. Despite ISED's commitment to improving cellular access on main roads, Nova Scotia has not yet received funding aligned with these goals. Additionally, telecommunications companies are not advancing technologies that could benefit rural economies, and recent Canadian Radio-television Telecommunications Commission (CRTC) rulings have led to reductions in capital budgets over the past year.

Unserved areas and weak cellular signals continue to pose significant challenges. Build Nova Scotia regularly receives feedback from communities and individuals across the province who are served by existing infrastructure, but inadequate signal strength impacts their connectivity, this is often attributed by

telecommunications companies to capacity issues. In recent years, fires, floods, hurricanes, and other extreme weather events have placed a substantial financial burden on provinces, leaving rural communities especially vulnerable due to insufficient telecommunications infrastructure.

Build Nova Scotia is committed to improving cellular and fibre-optic connectivity across the province. By the end of 2024, 99.99% of homes and businesses will have fibre access, and plans are in place to ensure over 99% of civic addresses and primary roadways have improved cellular connectivity. Nearly \$70 million has been approved for cellular projects. Federal support is crucial to reaching the remaining areas, especially the most remote. In the short term, supplemental mobile coverage by satellites will help close the connectivity gap.

Provincial governments face significant challenges in improving connectivity and ensuring service reliability, as we lack legislative jurisdiction over telecommunication service providers, a responsibility that falls under the authority of the Canadian Radio-television Telecommunications Commission.

Reliable cellular connectivity is essential for driving economic growth and ensuring the safety of both citizens and visitors. With support from the Government of Canada, Nova Scotia can enhance its appeal as a prime location for business development and foster growth in rural communities.

To achieve this, it is crucial to legislate 911 uptime delivery to ensure calls are reliably connected from handsets to call centres over both cellular and landline networks. Mandating that internet and cellular services be treated as essential services is vital for the safety and well-being of Nova Scotians.

Following the CRTC's decision to mandate open access to networks, the Government of Nova Scotia anticipates increased competition and potential price reductions. The province urges strong enforcement of this ruling, noting the impact in Quebec where delayed service provision by telecommunications companies has had negative consequences. Allowing Mobile Virtual Network Operators (MVNOs) access to networks at fair prices is essential for supporting future population growth and economic development.

Our approach in this response is to provide general suggestions for questions, while leaving the technical details to other groups with specialized expertise.

Q1-4- Service areas will be a key consideration for satellite coverage. The areas the province aims to reach are typically smaller and more isolated. These service areas must be sized to remain profitable for companies while still being accessible to smaller communities. Build Nova Scotia does not have a specific comment on which frequency bands to use, but the focus must remain on reaching unserved and underserved areas.

Q5-Q8- No Comment

Q9- Build Nova Scotia can provide a list of currently underserved and unserved roads from past studies, as well as feedback on gap areas. This is a critical issue for the province, as telecom providers have not extended networks to rural areas due to a limited customer base. Additionally, there are reports of their systems being "oversubscribed," highlighting the need for improved service in some areas that technically have coverage but do not have adequate service to meet residents' needs.

Q10- No Comment

Q11/12- A key concern with "accommodated by its existing network capacity" is that many areas currently lack sufficient network capacity. Build Nova Scotia supports using SMCS to back up these systems, provided there is no delay or lag, as this would be an effective application of the technology.

Q13- Q16- No Comment

Q17- As a province surrounded by water with many ocean-based industries, Build Nova Scotia strongly encourages ISED to ensure these industries have constant access to satellite services in case of emergencies.

Q18- Q29- No Comment

Sincerely,



David Benoit  
President and CEO  
Build Nova Scotia