

**ISED Consultation
Canada Gazette, Part I, SMSE-006-24**

**Consultation on a Policy, Licensing and Technical
Framework for Supplemental Mobile Coverage by Satellite**

Submission from the First Mile Connectivity Consortium

September 13, 2024

First Mile Connectivity Consortium
PO Box 104
Fredericton, NB E3B 4Y2
1-888-995-8847
<http://firstmile.ca/>
info@firstmile.ca

Introduction

1. The First Mile Connectivity Consortium (FMCC) is an incorporated independent not-for-profit national association. Our members are First Nations Internet service providers known as “community/regional intermediary organizations.” Our associate members are university and private sector researchers and others interested in Indigenous and community communications and telecommunication services for the public good. Our work focuses on innovative solutions to digital infrastructure and services with and in rural and remote regions and communities across Canada. More details about our members and activities are available at: <http://firstmile.ca>

2. We welcome ISED’s decision to examine developing a new licensing and technical framework for Supplement Mobile Coverage by Satellite (SMCS) and policy objectives. FMCC supports ISED’s aim to support the expansion of mobile services in underserved areas, including rural, remote, and Indigenous communities.¹

3. The satellite industry is particularly important for Canada’s North and for Indigenous peoples living in remote and isolated communities. Many communities continue to rely on satellite services while others are examining the potential to expand existing services to include 911 services in currently unserved regions.

4. Remote Indigenous residents also need better mobile communications in remote and Indigenous regions including on the land, on water and on isolated and winter roads. Existing mobile satellite services are too expensive for regular use.

3. Several of our member organizations will be impacted by any new regulations on the use of spectrum in their territories and communities, as such FMCC will be offering comments in the next stage of the proceeding.

Meaningful Consultation with Indigenous Entities

4. As indicated in previous submissions to ISED, we raise concerns regarding the role of ISED in these matters and the existing approach taken for consultation with Indigenous governments, organizations and communities. ISED must revisit, review and redefine decision-making processes related to spectrum in a way that upholds First Nations’ rights, title and treaty rights and Canada’s obligation to bring federal ways, policies and other collaborative initiatives and action into alignment with the *UN Declaration on the Rights of Indigenous Peoples* (UNDRIP), the Crown’s legal duty to consult and collaborate with Indigenous Peoples, and free, prior and informed consent.

The Northern Indigenous Community Satellite Network

5. FMCC includes representatives who are working with the Northern Indigenous Community Satellite Network (NICSN). Established more than 10 years ago, NICSN was the first inter-

¹ <https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/learn-more/key-documents/consultations/consultation-policy-licensing-and-technical-framework-supplemental-mobile-coverage-satellite>

provincial community owned and operated broadband satellite initiative in Canada. The NICSN partnership is made of the Kativik Regional Government (KRG) in Nunavik and Northern Québec; Keewatinook Okimakanak (KNet) in Northwestern Ontario; and the Keewatin Tribal Council which delivers services through Broadband Communications North (BCN) in Northern Manitoba.

6. As demonstrated by the NICSN partnership, First Nations are seeking strategies that support their Ownership, Control, Access and Possession (OCAP) of both the transport and the local network to properly address local needs and priorities at affordable rates.

7. NICSN is the result of several years of development and over \$5 million in strategic capital investment by Industry Canada and brought together partnerships from industry, not-for-profit and government to serve the broadband needs of the participating communities. It is a cooperative venture connecting over 30 remote communities from the northern regions of Manitoba, Quebec and Ontario. It is administered through an innovative partnership of Keewatinook Okimakanak, Keewatin Tribal Council and the Kativik Regional Government.

8. The development of a new licensing and technical framework for SMCS will impact services in First Nation communities within the service territory of NICSN, and it is vital that representatives from these communities and their telecom service providers are part of this proceeding.

Keewatinook Okimakanak (KNet)

9. KNet currently offers a range of services to rural and remote communities in Northern Ontario including fibre and satellite transport. Currently, KNet faces several challenges when there is a fibre break in a remote area; outages have lasted up to 5 days for communities because there is no backbone redundancy. Additional satellite backup would help mitigate outages and allow for more network resiliency. It is critical that any new regulatory and technical framework not compromise existing networks, and work to complement and support them.

Eeyou Communications Network (ECN)

10. Currently the Cree communities in Northern Québec do not have 911 services; each community has its own Emergency Dispatch number. This has been cited as a public safety issue. ECN is currently conducting a study on developing the capacity for 911 services in Eeyou Istchee. Any development of a new regulatory framework that impacts First Nation communities and service providers must be done in consultation with providers like ECN.

Intention to participate in the proceedings

11. We appreciate the opportunity to participate in this consultation, and intend to review other submissions and to submit comments to meet the next deadline of October 25, 2024.

***** END OF DOCUMENT *****