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April 5, 2019

Pamela Miller, Director General  
Telecommunications and Internet Policy Branch  
Innovation, Science and Economic Development Canada  
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**RE: Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation**

Dear Ms. Miller:

The Federation of Canadian Municipalities (FCM) welcomes the opportunity to provide comments on Innovation, Science and Economic Development Canada's (ISED) proposed direction to the Canadian Radio-television and Telecommunications Commission (CRTC) published in Canada Gazette, Part 1, Vol. 153, No. 10, on March 9, 2019.

FCM has long advocated for the federal government to take a leadership role and develop an ambitious, comprehensive and long-term national broadband strategy, in consultation with relevant departments and agencies, including the CRTC, provinces/territories, municipalities, Indigenous communities, the private sector and civil society. Budget 2019's proposed investments to expand Canada's broadband infrastructure respond directly to recommendations made by FCM, and these funding opportunities promise to significantly address the gaps in telecommunication services in rural, remote and northern communities. As ISED is mandated to increase high-speed broadband coverage and to foster a strong investment environment for telecommunications services, FCM continues to support ISED in leading the development of national strategy, policy setting and ongoing reporting on progress toward mandated standards, and for policy and programs to enable faster roll-out of mobile networks in rural areas.

FCM welcomes initiatives aimed to increase access and affordability, and believes that fostering connectivity is essential to prosperity and growth for communities across the country. In past submissions to the federal government, FCM has encouraged the prioritization of broadband and telecommunications projects that address affordability. As such, FCM welcomes ISED's direction to the CRTC to foster affordability and lower prices and to ensure that affordable access to high quality telecommunications services is available. Communities also need broadband services that are consistent and reliable and that meet their needs at an affordable price, which is why FCM has also recommended that the federal government ensure the CRTC's mandate of an unlimited data option for fixed broadband services is fully implemented by the telecommunications sector.



Closing the broadband gap and reducing the significant lag-time in bringing faster speeds to rural and remote areas is critical to enhancing Canada's global competitiveness and ensuring that all Canadians have access to online services and the economy. FCM strongly encourages ISED to consider the impact of any changes to telecommunications regulations on the provision of telecommunication services to rural, remote and northern communities.

Furthermore, as the owners and managers of the spaces where most of the telecommunications infrastructure is physically installed, FCM encourages the federal government to engage local governments and to leverage their expertise to support the achievement of these policy objectives. While FCM acknowledges the need for reduced barriers to entry and the enabling of innovation in telecommunications services, municipal rights-of-way must be respected when new initiatives are adopted or policy changes are made. As noted in FCM's recent submission to the *Broadcasting and Telecommunications Legislative Review*, FCM recommends maintaining the current sections of the *Telecommunications Act* (s. 43 and 44) to ensure the last 25 years of precedent and best practices are preserved. Municipalities play a pivotal logistical role in telecommunications rights-of-way, and are committed to facilitate timely, orderly, safe, and cost-effective deployment of communications infrastructure in Canada.

FCM appreciates the opportunity to share its views with ISED on how the proposed order to the CRTC might improve access and affordability to telecommunications services. For additional information or inquiries, please contact Jean Lawson, Policy Advisor, at [jlawson@fcm.ca](mailto:jlawson@fcm.ca) or 613-907-6246.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brock Cartlon', with a long horizontal flourish extending to the right.

Brock Cartlon  
Chief Executive Officer