



RMA
RURAL MUNICIPALITIES
of ALBERTA

RMA Submission on a Policy and Licensing Framework for Spectrum in the 3500 MHz Band

July 25, 2019



This submission is made regarding Consultation on a Policy and Licensing Framework for Spectrum in the 3500 MHz Band (SLPB-002-19), as announced in the *Canada Gazette* Part I, Volume 153, Number 25 on June 22, 2019.

The Rural Municipalities of Alberta (RMA) advocates on behalf of Alberta's sixty-nine rural municipalities. RMA members have several common traits: large land masses, relatively small populations, and a lack of a traditional "population center." RMA members provide municipal government to approximately 85% of Alberta's land mass, and therefore have unique concerns and perspectives on many issues.

While RMA does not have the technical expertise, nor is it within our scope, to respond to every question in the consultation document, certain questions related to the provision of internet service in rural areas are important to RMA and its members. The responses will quote the corresponding question number from the consultation document.

Partial Service Areas

Section 8.1.1 addresses the logistics of a proposed spectrum auction process. In this section, the use of partial Tier 4 service areas, and therefore partial Tier 4 licenses, is proposed. Question 3 addresses various aspects of utilizing partial Tier 4 service areas. However, a recent decision (a Decision on a New Set of Service Areas for Spectrum Licensing, DGSO-006-19) allows for the creation of Tier 5 spectrum areas. Tier 5 service areas will be smaller in geographic area, and appear to fill the same role as the proposed partial Tier 4 service areas referred to in section 8.1.1 of this current consultation. RMA is interested in learning how the results of the DSGO-006-19 decision will work with the use of partial Tier 4 service areas. RMA is seeking clarity on the following points:

- Would the partial Tier 4 service areas eventually be replaced by Tier 5 service areas?
- Tier 5 service areas will be classified as metropolitan areas, urban areas (medium and large population centres), rural areas, and remote areas. The explanation of the partial Tier 4 service areas in this current consultation appear to indicate a different method of delineating area. As Tier 5 service areas are implemented, will there be a process to reconcile these two new service areas for ease of understanding auctions and consultations?
- Will partial Tier 4 service areas only be used where split licenses already exist? If new partial service areas are to be created, RMA would like to reinforce previous comments made about ensuring these areas do not lead to inequality in service provision for rural areas by way of allowing service providers to select high profit areas near cities while leaving rural areas underserved.

5G LTE and Fixed Wireless Access

In response to question 14, RMA is seeking clarification that the rollout of 5G LTE coverage on the 3500MHz spectrum will not occur at the loss of fixed wireless access (FWA) internet service providers. FWA operators in rural areas utilize the 3500 MHz spectrum to deliver highspeed internet. Auctions for 5G mobile coverage should clarify that bandwidth allocated for FWA operators cannot be reallocated for 5G coverage unless a suitable highspeed internet replacement is in place for the rural areas currently served by FWA operators.

An additional concern regarding question 14 is the repeated use of population as the metric for evaluating service coverage. Due to the low population density of rural and remote areas, it is foreseeable that a large geographic area could remain entirely unserved while meeting the 90% or 97% LTE coverage goals in paragraph 171. RMA suggests incorporating geographic coverage as an additional goal to ensure rural and remote areas receive service. Utilizing only population will foreseeably lead to large areas in rural Alberta, and other provinces, being left unserved.

General Comments

In the process of allocating the 3500 MHz spectrum, RMA would like to emphasize the importance of reserving bandwidth for emergency services and government communications. As 5G is deployed across Canada, it is important to maintain access for emergency services.

A second general comment is the importance of both minimum service levels and the cost for users to access the service. RMA appreciates the statement in paragraph 9 emphasizing the role of the 3500 MHz band for rural internet access. Additionally, the recent \$85 million funding announcement by Minister Bain for satellites to provide internet access in rural and remote Canada, is welcomed by RMA. However, the need for minimum service levels and equitable costs to access these services should become part of broadband development plans, and a commitment to meeting 50/10 service speeds should be a requirement for all spectrum auction participants.

Summary

RMA appreciates the opportunity to comment on the proposed changes to licensing spectrum in the 3500 MHz band. While not able to provide feedback on all of the questions, RMA's general comments are related to ensuring changes to spectrum allocation do not have unintended consequences for rural areas.