

September 9, 2019

Innovation Science and Economic Development Canada
Senior Director, Spectrum Licensing and Auction Operations
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Submitted via email to ic.spectrumauctions-encheresduspectre.ic@canada.ca

To the Spectrum Licensing and Auction Operations Branch,

RE: *Canada Gazette, Part 1, June 2019, Consultation on a Policy and Licensing Framework for Spectrum in the 3500 MHz Band, SLPB-002-19*

5G infrastructure will be a crucial business-enabling technology for Canadian companies and beyond. The Toronto Region Board of Trade (the Board) views the upcoming auction as an important step in the establishment of Canada's 5G market, which is why it is important that the Department of Innovation, Science and Economic Development gets it right.

The successful roll out of 5G in Toronto and the rest of Canada will have a transformative impact. Emerging technologies such as Connected and Autonomous Vehicles can help make our roads greener and safer for Canadians but are reliant on the enhanced connectivity 5G promises. Similarly, 5G will help make true smart cities a reality, enabling the analysis of huge amounts of data that a city generates every day to help create more efficient and responsive public services.

Getting the roll out of 5G right will be crucial to realizing these impacts. It is the Board's view that the auction should be timely and carried out in a way that maximizes the benefits for both business and individual users.

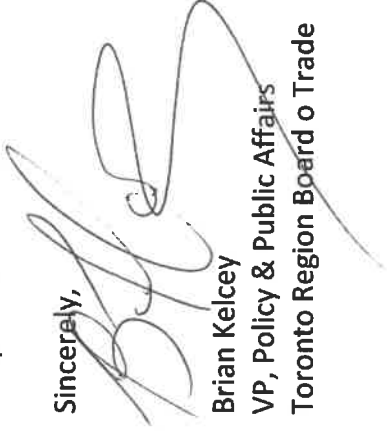
5G differs from past wireless technology roll outs in important ways. Existing rules and regulations were developed to address past technologies, such as central cell towers. 5G instead will be built off large numbers of small cells using smaller equipment. A report by the CWTA estimated that up to 273,000 of these small cells will need to be deployed across Canada by 2025 in comparison to the existing network of 33,000 large towers. Beyond the auction, the Board believes it is going to be essential to standardize access to municipal infrastructure for the installation of the necessary equipment to prevent delays in roll outs.

The scale of infrastructure required to deploy 5G across Canada is a challenge that will require significant and ongoing investment. The Board believes that the Department needs to work closely with industry and other stakeholders to design a regulatory environment that continues to encourage the much-needed capital investment into 5G infrastructure by the private sector.

Around the world, our competitors are supporting the rollout of business-enabling digital infrastructure like 5G. By taking these steps, ISED can ensure that customers, governments, and businesses have access to transformative wireless 5G technologies that will mark Canada out as a global leader.

On behalf of our 13,500 members, I want to thank you for the opportunity to provide feedback on the upcoming auction and beyond. We look forward to the timely rollout of next steps in this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'BK', with a long, sweeping horizontal line extending to the right.

Brian Kelcey
VP, Policy & Public Affairs
Toronto Region Board of Trade