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**Submission by the First Mile Connectivity Consortium (FMCC) in:
ISED's Consultation on Revisions to the 3500 MHz Band to Accommodate Flexible Use
and Preliminary Consultation on Changes to the 3800 MHz Band**

1. The FMCC is an incorporated independent national not-for-profit national association. Our members are First Nations internet service providers that also represent residents in remote and rural First Nation communities. Importantly, our member organizations support broadband-enabled public services such as online education and telehealth, as well as services for household consumers. The FMCC associate members are university and private sector researchers and others interested in Indigenous and community communications and telecommunication services for the public good.
2. Our work is tied to a paradox – the regions with the highest need for broadband (due to the lack of locally available services, such as high schools, hospitals and businesses) are also those with low-speed, expensive, inadequate services, when compared to urban communities. To address these challenges, the FMCC is promoting the 'First Mile' approach to telecommunications development. Rather than start in urban centres, this perspective advocates for community-based organizations to drive their own development initiatives.
3. The FMCC research partner is the First Nations Innovation project that has conducted and published research on innovative solutions to digital infrastructure and services with and in rural and remote regions and communities across Canada.
4. The FMCC has participated in previous consultations concerning access to broadband in rural, remote, and Indigenous communities. For more information on FMCC and its research publications and interventions in previous policy and regulatory proceedings please visit: www.firstmile.ca.

The Need for Reliable and Affordable Broadband

5. Access to reliable and affordable broadband can make it possible for all Canadians to become effective contributors to Canada's innovation goals, as defined by ISED. FMCC looks forward to the time when Canadians in rural, remote and Indigenous communities can participate fully and equally in our society.
6. Our submissions in previous proceedings have identified the need for broadband in remote and isolated communities. We have pointed to the need for broadband for education, health care, governance, non-profit organizations and businesses. We have also emphasized that broadband services must be highly reliable and affordable. We have noted not only the

geographic but also the demographic challenges of serving these communities, where incomes are low and many family members may share a single internet connection.¹

7. We are therefore concerned about ISED's proposals concerning 3500 MHz as they could affect rural and remote regions and indigenous communities. Below, we outline the risks to these regions and alternative proposals to those put forward to ISED.

Response to “Q12 – ISED is seeking comments on alternative transition plans, or variations to the times proposed. Respondents are asked to provide a rationale for any alternative proposals.”

8. In its introductory statement, ISED makes several references to the importance of broadband in rural regions:

... given Canada's geography and widely dispersed population, it can be difficult to make a business case for the deployment of new innovative services in some rural and remote areas of the country. Consequently, some rural areas may continue to rely on fixed wireless access in the 3500 MHz band over a longer period of time than urban areas. As such, and in accordance with one of the objectives of the Telecommunications Act—to *promote the availability of reliable and affordable services to all regions of Canada*—ISED continues to consider options for promoting access in rural areas within the context of managing this spectrum resource, and within a broader policy context, noting that challenges may vary based on geography, population density and the state of the marketplace (para 8). (Italics added)

9. Further, ISED states that its policy objectives for the 3500 MHz band include:

- facilitate the deployment and timely availability of services across the country, *including rural areas* (para 10, italics added).

10. Accordingly, ISED proposes longer timelines for notification of withdrawal of 3500 MHz fixed services and frequencies in rural regions than for urban areas (section 6.10). However, our concern is not with timelines, but with *available and affordable alternatives* to provide high quality broadband service in these regions and communities.

11. The FMCC notes that the CRTC in its Decision 2016-496 established a universal service objective: “Canadians, in urban areas *as well as in rural and remote areas*, have access to voice services and broadband Internet access services, on both fixed and mobile wireless networks.” (italics added)

12. Further, the CRTC determined in Decision 2016-496 that Canadian residential and business fixed broadband internet access service subscribers should be able to access speeds of at least 50 Mbps download and 10 Mbps upload.

13. ISED's proposals concerning 3500 MHz make no reference to this universal service definition and mandated minimum speeds. The FMCC believes that these requirements must be considered in any proposals affecting access to broadband in these regions.

14. The FMCC therefore states that fixed wireless service for internet and broadband in the 3500 MHz band should not be discontinued in rural, remote and Indigenous regions

¹ See, for example, FMCC interventions in CRTC 2017-112, 2015-134, 2014-44 and 2012-669.

and communities until reliable and affordable broadband of at least 50 Mbps download and 10 Mbps upload is available using alternative technologies.

Conclusion:

15. We appreciate the opportunity to participate in this consultation, and would be pleased to provide additional information. Our email contact is **info@firstmile.ca**.

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