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November 17, 2014

Ms. Kelly Gillis  
Senior Assistant Deputy Minister  
Industry Canada  
300 Slater Street  
Ottawa, ON K1A 0C8

Dear Ms. Gillis:

**Re: Canada Gazette, Part I, August 19, 2014, DGSO-003-14  
Consultation on Policy Changes in the 3500 MHz Band (3475-3650 MHz)  
and a New Licensing Process in Rural Areas**

Thank you for meeting with the ROMA Board on November 13, 2014 to discuss the proposed changes affecting rural internet service in the *Consultation on Policy Changes in the 3500 MHz Band (3475-3650 MHz) and a New Licensing Process in Rural Areas*, DGSO-003-14, dated August 19, 2014 (the "Consultation Paper").

We appreciated your assurances that those companies who are using their licenses and providing services to rural customers and communities will not have those licenses taken away. It was reassuring to hear that we share the goal of making certain that rural populations have access to the internet and tele-communications tools required to be viable. Rural economic stability and growth is founded on the ability of communities to participate in knowledge based endeavors, distance training, remote medical diagnostics and supports to name a few.

At the meeting, it was requested that Industry Canada lay out a clear set of actions for providing access to these connectivity tools in a comprehensive and long term plan. Both wireless through fixed, mobile or satellite and wired access are needed to sustain rural municipalities. It was unclear if such a plan of actions exists. While market forces do come to bear, the government must lead and guide these forces to the benefit of rural Ontarians and not just allow the market to self-direct to places where the economies of scale make it easy to flourish.

As all services need to be accessible in all areas, it seems the names “rural” and “urban” are poor descriptors. We have no alternates to suggest but think this naming formula is creating concerns.

The ROMA Board supports the recommendations of the Federation of Canadian Municipalities (FCM) below:

1. All existing fixed wireless access providers that meet Industry Canada’s conditions of license must continue to have access to 3500 MHz spectrum, regardless of whether they are providing service in a “rural” or “urban” area as defined in the consultation document.
2. For “urban” areas, Industry Canada should allow existing rural fixed wireless providers to maintain a block of spectrum that is sufficient in size\* to accommodate current needs and allow for future growth, with any remaining spectrum allocated to mobile services. *\*there is some thought at ROMA that “blocks” might be a good descriptor.*
3. For the sake of certainty, Industry Canada should set aside a block of spectrum for rural fixed wireless services in “urban” areas that can be utilized in the event that an existing fixed wireless provider needs to be transitioned to a different block for technical reasons.

To the third point from the FCM recommendations, we must underline the need to set aside space for future growth in rural municipalities. Offering licenses that need to be fully developed in one year may help spur growth, but the reality of fewer users in rural areas could mean that further incentives are required to establish the services. Industry Canada needs to incorporate the slower uptake into the long term plan and make sure there is enough spectrum set aside to meet rural needs into the future, despite pressures from other sectors.

We urge the Minister of Industry and Industry Canada to embrace a long term plan that allocates sufficient spectrum to rural Ontarians for development over time and to leave the licenses in place for spectrum that is in use today.

Sincerely,



Ron Eddy  
Chair

cc: Hon. James Moore, Minister of Industry  
Charlie Angus, MP Timmins – James Bay  
Glenn Thibeault, MP - Sudbury  
Peter Hill, Director General, Spectrum Management Operations Branch  
Dan Casselman, Policy Advisor, Federation of Canadian Municipalities  
Eastern Ontario Wardens’ Caucus  
Todd Case, Chair, Western Ontario Wardens’ Caucus  
Jim Pine, CAO/Clerk, County of Hastings  
Geoff Hogan, Director of IT, County of Grey