



Sent via email to: navdeep.bains@parl.gc.ca

July 24, 2018

The Honourable Navdeep Bains
Minister of Innovation, Science & Economic Development
235 Queen Street, 11th Floor
Ottawa, Ontario
K1A 0H5

Re: Proposed Changes to the 3500 MHz Band

Dear Minister:

I am writing to you today on behalf of the Rural Ontario Municipal Association (ROMA). ROMA is the rural arm of the Association of Municipalities of Ontario (AMO). ROMA takes pride in promoting, supporting and enhancing strong and effective rural governments.

ROMA wishes to express our deep disappointment regarding your department's Consultation proposals on the 3500MHz band. In 2014 a similar consultation concluded with promises and programs to support committed 3500MHz band to rural Ontario. Now, without explanation, it appears that this commitment is being significantly eroded.

We certainly support the need for competition to reduce pricing and increase innovation. However, it appears that the likely outcome of the proposed approach would result in taking away rural allocation in favour of mobile services in the more densely populated areas. Even more disturbing is the proposed removal of service from existing customers. This is entirely unacceptable. As there are known companies with unused service in the band, it would seem logical to look to this first for re-deployment. That said, we support the view that companies who own spectrum should be required to use it within a reasonable timeframe otherwise it should be returned to the Government for distribution to companies who will deploy it.

To best foster rural broadband, it would make sense to disaggregate rural service areas from densely populated cores. We understand that there is a fear that economies of scale may not be reached if the number of potential customers is too low. However, we know there are companies focused on rural customers but they cannot afford to purchase band space if large centres are included. We ask you reconsider your mapping boundaries to better facilitate and support rural service.

Finally, it is difficult to understand the reasons why this consultation is short and during the summer when many stakeholders are not available to participate in the process.

If the proposal proceeds without amendment, we are convinced that many thousands of households, businesses and institutions will be hampered. Connectivity is so vital to rural life; be it to access health care, education or economic opportunity. We trust you will bear this in mind as the consultation comes to a close and decisions are made. We would be happy to organize a meeting of Ontario municipal leaders to have a fuller discussion soon with you and your staff.

Yours truly,



Ron Holman
Chair of ROMA

cc. Robin Jones, Chair, Eastern Ontario Wardens' Caucus
David Fell, CEO, Eastern Ontario Regional Network
Geoff Hogan, CEO, South Western Integrated Fibre Technology Network
Wendy Landry, President, Northwestern Ontario Municipal Association
Alan Spacek, President, Federation of Northern Ontario Municipalities
Lynn Dollin, President, Association of Municipalities of Ontario