



Sent via e-mail: spectrum.operations@ic.gc.ca

October 3, 2014

Mr. Peter Hill
Director General, Spectrum Management Operations Branch
Industry Canada
300 Slater Street
Ottawa, ON K1A 0C8

Dear Mr. Hill:

**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**

Today the Rural Ontario Municipal Association (ROMA) learned that Industry Canada has proposed changes effecting 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 are gravely concerned about this proposal.

ROMA is the rural arm of the Association of Municipalities of Ontario (AMO). The Association is an integral part of AMO and a number of its Executive Members serve on the AMO Board of Directors. Policy, research and advocacy activities are undertaken by ROMA through AMO. Matters which affect rural communities are brought to the attention of the provincial and federal governments.

Our comments are responding to the proposals in questions 1, 7 and 8 of the Consultation Paper.

While we share the stated goal of ensuring the best possible high-speed Internet in Ontario's rural regions, the proposals in the Consultation Paper would not have that effect. The proposals, as drafted, take away spectrum in use today to provide Internet service to Ontarians outside of the big cities and give it to telephone companies for future mobile phone use. If that happens, hundreds of thousands of current residential and business

customers in rural Canada will lose their existing high-speed Internet service, including people in our area. Access to Internet is the foundation of economic enterprise in rural areas. This proposal is a step backwards for rural Ontarians and not in keeping with the stated goal of increasing Internet access for Ontarians.

The proposed reclassification of the licensed areas would designate vast rural areas as “urban” areas. Once this reclassification happens, the proposal then calls for all the “urban” licences to be taken away from rural Internet service providers (ISPs), even though the licences are in use providing service to people today and for that spectrum to be given to cellular phone companies for future use with smart phones that have not yet been developed.

We do not support any proposal that ignores the current needs of rural Ontarians by taking away ALL of the spectrum and giving it to cellular companies.

The Consultation Paper states that the “Government of Canada is committed to ensuring that Ontarians benefit from the availability of advanced, competitively priced telecommunications services in all regions of the country” and has a commitment “to extend and enhance broadband Internet services in rural and northern communities in order to meet the continued demand for fixed services in rural areas”.¹ However, the proposals in the Consultation Paper do not live up to those promises. Any proposal that would see a large number of rural Ontarians being designated “urban” and having fixed wireless Internet service in their areas shut down does not benefit “all regions of the country”. It sacrifices the current needs of rural communities, takes away the economic and social benefits of the Internet from rural residents and undermines all the hard work that rural areas have done to ensure we connect rural residents to high quality Internet services.

We urge the Minister of Industry and Industry Canada to reject the flawed proposals in the Consultation Paper and, at the very minimum, to do no harm – please leave the licences in place for spectrum that is in use today providing service to Ontarians and exempt the licensees that are delivering high speed fixed wireless internet services today from any requirement to depart from this spectrum. Please do not take away Internet service from rural residents.

Sincerely,



Ron Eddy
Chair

¹ Consultation Paper, para. 6.