October 18, 2018

Standing Senate Committee on Transport and Communications
c/o Shaila Anwar, Committee Clerk
Committees Directorate
Senate of Canada
Room 1019, Chambers Bldg,
Ottawa, ON
K1A 0A4

Dear Committee Members:

On behalf of the Rural Ontario Municipal Association (ROMA), I would like to respond to the Committee call for input on how the Federal *Telecommunications Act, Broadcasting Act, and Radiocommunication Act* can be modernized to account for the evolution of the broadcasting and telecommunications sectors in the last decades. While the breadth of these deliberations is wide, we will limit our comments to access to broadband in rural areas of Ontario.

ROMA has advocated for years that rural Ontario should have access to broadband and fixed wireless services on par with those available in urban centers. Both students and businesses will not be able to compete in the global economy without access to the connectivity necessary to thrive in a highly digitized world. Broadband speeds must also be continuously re-evaluated to ensure they remain reflective of the latest technological developments.

An ongoing concern is the auction of spectrum. Despite assurances that rural access to high speed internet is a federal priority, in the past couple of years there have been at least two proposed changes to the allocation of spectrum that would disadvantage rural access. In one case spectrum would have transferred from providers who focus on rural and remote service to larger providers who focus on urban users. These changes would actually remove access to existing high-speed internet service for thousands of people. Access to internet is the foundation of economic enterprise in rural areas. These types of changes to the allocation of spectrum is a step backwards for rural Ontarians and not in keeping with the stated goal of increasing internet access for Ontarians.

In keeping with this theme is the redefinition of urban and rural for the allocation of spectrum. A recently proposed reclassification of the licensed areas would designate vast rural areas as “urban” areas. Again, this creates the potential to focus on densely
populated areas and not serve sparsely populated areas in a service region. You will note that rural areas in Eastern, Southwestern and Northern Ontario have worked hard to support the expansion of infrastructure required to have high quality broadband and fixed wireless services. Any proposal that would see a large number of rural areas being designated “urban” and having fixed wireless internet service in their areas shut down does not benefit rural areas. It sacrifices the hard work that rural communities have done to ensure access to high quality internet services.

Telecom providers have historically and understandably prioritized dense urban areas when expanding broadband connectivity since rural regions present a smaller customer base and a slower return on investment for these for-profit providers. ROMA recognizes that there are financial challenges to implementing high-speed service across Canada. Broadband infrastructure investment is necessary to increase internet access in rural communities, which may be located in remote, hard to reach regions. However, these financial obstacles must be weighed against the detrimental economic and social costs to rural communities that are unable to connect to the internet.

One solution would be for the Federal Government to provide incentives to telecom providers and community based private public partnerships to invest in rural broadband connectivity. As well, the Federal Government could more effectively create policy stability for rural spectrum auctions. Providing access to modern communications technology can be realized if high-speed broadband access is viewed as an essential service and we continue to seek and implement innovative solutions.

We look forward to the report of the Committee.

Sincerely,

Ron Holman
Chair of ROMA

cc: Robin Jones, Chair, Eastern Ontario Wardens’ Caucus
    Gerry Marshall, Chair, Western Ontario Wardens’ Caucus
    Wendy Landry, President, Northwestern Ontario Municipal Association
    Danny Whalen, President, Federation of Northern Ontario Municipalities