



October 8, 2014

Mr. Peter Hill  
Director General, Spectrum Management Operations Branch  
Industry Canada  
300 Slater Street (JETN, 15<sup>th</sup>)  
Ottawa, ON K1A 0A5  
Email: spectrum.operations@ic.gc.ca

Dear Mr. Hill:

**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**

The Federation of Northern Ontario Municipalities (FONOM) has been made aware of Industry Canada's proposed changes that would affect rural Internet service. These changes were provided 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.

FONOM represents 110 municipalities across northeastern Ontario, many of them rural communities. Northerners depend on high-speed Internet to remain connected to the rest of the province, country and world. Quality Internet service provides rural residents with the ability to obtain information, social inclusion and engage in business activity.

Our comments respond to the proposals in sections 1, 7 and 8 of the Consultation Paper.

FONOM appreciates the priority your government has placed on extending high speed Internet access to communities across rural Canada as stated in the *Economic Action Plan, 2014* and more specifically, through the *Digital Canada 150* strategy. The initial intention to address the issue of licensed, unused spectrum was supported by stakeholders. However, the proposed changes as outlined by Industry Canada appear to focus on obtaining spectrum for mobile services. Although there is a demand for mobile broadband in urban areas, there is also a demand for fixed wireless broadband in rural areas that must be maintained.

In order to utilize spectrum from the 3500 MHz band, licensed areas across the country would be reclassified under "urban" or "rural." Under the proposed changes, all "urban" licenses would be taken away from rural Internet service providers (ISPs). The main concern that FONOM has with this proposed classification system is that some rural areas will be lumped into the urban areas and thus, those rural areas would lose their current accessibility to Internet.

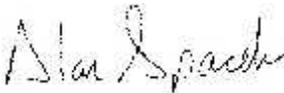
# FONOM

The Federation of Northern Ontario Municipalities

FONOM understands the need for Industry Canada to maximize the economic and social benefits derived from the use of radio frequency spectrum. However, if segments of the population are deprived of access to essential high-speed Internet service for social or business use, then the proposed changes should not be adopted. Obtaining the best possible high-speed Internet across the country is imperative; therefore, we believe these proposals would put particular rural Canadians at an immediate adverse situation.

We urge the Minister of Industry and Industry Canada to reject the proposals in the Consultation Paper. Any change must take into consideration the social and economic impacts on rural Canadians. Accessibility to high speed Internet is imperative for those living in rural communities to have a superior quality of life.

Sincerely,



Alan Spacek  
President