



January 10, 2019

The Broadcasting and Telecommunications Legislative Review Panel  
c/o Innovation, Science and Economic Development Canada  
[ic.btlr-elmrt.ic@canada.ca](mailto:ic.btlr-elmrt.ic@canada.ca)

Dear Review Panel Members:

On behalf of the Saskatchewan Association of Rural Municipalities (SARM) Board of Directors, we would like to take this opportunity to provide comments to the Broadcasting and Telecommunications Review Panel on Canada's communications sector as it relates to rural municipalities (RM) and agriculture producers.

We would first like to reiterate our appreciation for the \$500 million investment (by 2021) by the federal government through the Connect to Innovate program and the CRTC's \$750 million Broadband Fund to bring high speed internet to rural and remote communities. Investments like these are necessary to help the CRTC meet its basic service objectives and to help ensure the affordability of broadband and cellular service across the country.

Reliable access to broadband is important for the health, safety, and well-being of those living and travelling in rural and remote areas. There are also numerous environmental benefits of reliable fixed and mobile internet connections. One example of how reliable cellular service can help livestock producers reduce their carbon footprint is in the use of solar-powered livestock watering systems with satellite-based water supply monitoring. Such systems send notifications to producers via email, SMS, or voice callout to alert them to low water levels which may result from low voltage of solar powered systems. These alerts, if reliable, increase the attractiveness of solar systems and can drastically reduce the almost daily trips producers take to check on water levels at each of their livestock watering troughs. Unfortunately, Saskatchewan's unique geography and population density makes providing broadband and cellular services across the province challenging which limits the feasibility of many technological innovations.

While we agree that information on the presence of upload and download speeds is important to determine if an area is underserved, it is critical that the data being used by the federal government and CRTC to make decisions about spectrum and funding allocations is accurate. In many locations across Saskatchewan there is service available that would meet the minimum download speeds, but these internet connections are not reliable. We believe that the related discrepancies warrant further data collection and analysis so that we have a true picture of broadband and mobile access across Canada.

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We would also like the federal government to ensure that adequate rural spectrum can be accessed by service providers who are indeed willing to bring service to rural Saskatchewan. Under the tiered system Internet Service Providers (ISP) were able to buy a license to use the province-wide Saskatchewan bandwidth with no requirement that it be deployed in rural areas as they are defined in Saskatchewan; ISPs could meet their rural service quota simply by providing service to an urban center. Additionally, we would like existing and proposed rules for broadband auctions and corresponding licenses reviewed through a rural lens to improve rural access to both high speed internet and cellular data connectivity.

SARM continues to support "use it or lose it" provisions regarding spectrum allocation and recommends that unused spectrum (after 2 years) by ISPs be made available to those willing to bring service to rural Canada. It is important to ensure that this type of provision remain in all future licenses.

Recent changes to the 3500mhz band resulting from the consultations that took place over summer 2018 have removed the tiers to determine service eligibility. We would appreciate clarification from your office as to whether this change will further limit mobile and/or fixed services to rural areas. While we support innovation in connectivity its application must not limit the already inadequate connectivity of rural areas.

I look forward to continuing to build a positive relationship with you and your colleagues around this important issue.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Ray Orb". The signature is written in a cursive, slightly slanted style.

Ray Orb  
President  
SARM