



October 7, 2014

Mr. Peter Hill
Director General, Spectrum Management Operations Branch
Industry Canada
300 Slater Street (JETN, 15th)
Ottawa, ON K1A 0A5

Via Email: spectrum.operations@ic.gc.ca

**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**

Dear Mr. Hill:

The Canadian Library Association/Association canadienne des bibliothèques has just learned that Industry Canada has proposed changes affecting 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.

The Canadian Library Association/Association canadienne des bibliothèques is the national voice for Canada's library communities, representing the interests of libraries, library workers, and all those concerned about enhancing the quality of life of Canadians through information and literacy. We believe that all Canadians deserve universal, equitable, and affordable access to robust information technology networks in order for them to participate in an information-driven economy. More specifically, we represent many public and academic libraries in rural areas that rely on wireless rural broadband, and whose communities in turn rely on the library as a provider of access.

These comments are in response 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 Canada'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 Canadians outside of the big cities and gives it to telephone companies for future mobile phone use. If this happens, hundreds of thousands of current residential and

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business customers in rural Canada will lose their existing high-speed Internet service. This proposal is a step backwards for rural Canadians and not in keeping with the stated goal of increasing Internet access for Canadians.

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, and for that spectrum to be given to cellular phone companies for future use with smart phones that have not yet been developed.

The Consultation Paper states that the Government of Canada 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 Canadians 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 the hard work that rural areas have done to ensure they 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 in order to best protect and encourage Internet access for rural Canadians.

Sincerely,

Original signed electronically

Marie DeYoung
President

c.c. Ron Eddy, Chair, Rural Ontario Municipal Association, amo@amo.on.ca;
Julie Gonyou, Co-Chair, Administrators of Rural-Urban Public Libraries of Ontario (ARUPLO),
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¹ Consultation Paper, para. 6.