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**Re: Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment**

Canadian Canola Growers Association (CCGA) appreciates the opportunity to comment on ISED's Consultation on New Access Licensing Framework, Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment. CCGA represents 43,000 canola farmers from Ontario to British Columbia on national and international issues, policies, and programs that impact farm profitability.

The canola sector is an innovative and strong contributor to Canada's economy, generating \$26.7 billion annually and supports 207,000 jobs across the country. Canadian canola is an export driven commodity and is shipped to over 50 markets around the world, with exports valued at \$11.9 billion in 2020. The canola industry has set an ambitious target to increase canola production to 26 million metric tonnes by 2025, and meet sustainability targets to improve energy and land efficiency, sequester more carbon, improve soil and water health, and protect biodiversity.

**Lack of rural connectivity is a severe problem that requires immediate solutions**

Rural connectivity is critical for the safety and long-term success of farmers and their operations. Lack of reliable access creates various barriers in the farm economy such as the inability to access new technology, challenges accessing programs to manage risk on their farm or labour, and most importantly, increases health and safety risks on farms. In a recent survey by the Keystone Agricultural Producers of Manitoba (KAP), many respondents expressed concerns about the ability to access emergency services when needed, obtaining weather and road condition reports, or the reliability of their alarm systems and security cameras on their property.<sup>1</sup> Weak wireless connection in rural areas also mean that farms are not able to fully participate in the digital economy (either accessing services or marketing their products online) as Canadians in more connected regions of the country.

Unreliable internet also results in inefficiencies and creates barriers to the adoption of new technologies on farm that are critical to achieving the production and environmental sustainability goals of the sector. Simple tasks such as loading internet pages or downloading software for farm equipment can take hours and the time required

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<sup>1</sup> Survey Report. Rural Cell and Internet Service in Manitoba. The Keystone Agricultural Producers of Manitoba. April 2020.  
[https://486d1ae5-bba6-4d54-8d48-301060955887.filesusr.com/ugd/e7b649\\_beba6db9c88c451abe3b947cdbc1d992.pdf](https://486d1ae5-bba6-4d54-8d48-301060955887.filesusr.com/ugd/e7b649_beba6db9c88c451abe3b947cdbc1d992.pdf)

to access these services essentially means they are inaccessible, particularly in busy periods of the crop year when time is of the essence. More broadly, connectivity issues slow the adoption of technology on farms and the pace of innovation within the sector, threatening Canada's competitiveness as a world leader in agricultural exports and sustainable practices. For example, precision agriculture technologies provide the ability to farm smarter and use less crop inputs but require access to large quantities of data and analysis to fully incorporate into farming activities. Education for rural communities is also a concern. With education moving more virtual the lack of rural broadband could cause students in those regions to lag behind those in more urban regions.

Despite its importance, rural Canada still faces inferior wireless service compared to their urban neighbours. According to the Canadian Radio-Television and Telecommunications Commission (CRTC), only 45.6% of households in rural communities have access to broadband coverage of 50/10 Mbps, the federal government's benchmark for universal internet, compared to 87.4% for Canada as a whole, and mobile coverage is still not equivalent.<sup>2</sup> In partnership with the Canadian Internet Registration Authority, the Agricultural Producers Association of Saskatchewan commissioned an internet speed test for Saskatchewan, and found that "over half of test takers are experiencing download speeds of less than 10 Mbps, which is only a fraction of the 50 Mbps considered to be a sufficient internet speed for Canadians."<sup>3</sup> These numbers underscore the critical work that remains and the importance of government keeping rural broadband deployment a priority and working with industry to expedite access.

### **An outcomes-based approach is required**

CCGA applauds the intention of this consultation to "support innovation and the availability of rural services." Farmers are not in the business of obtaining spectrum licences, however, as noted earlier, they are directly affected by how spectrum gets deployed. Therefore, policy and regulatory considerations concerning how rural broadband gets deployed should at its basis seek to solve issues of the end-use customer: that be promoting equitable, affordable, reliable access to modern wireless speeds for all Canadians regardless of where they live. It is with this approach in mind that CCGA will offer the following comments, that can be utilized regardless of what additions or changes will be made to licence type.

CCGA is of the view that a primary method to achieve those objectives is through more stringent deployment requirements and competition. Deployment requirements, regardless of licence type, should include criteria to deploy spectrum to Tier 5 rural and remote service areas. To avoid more densely populated areas solely benefiting from the new spectrum, it is recommended ISED change deployment requirements from a population percentage alone, to also including serving a specific geographic area in the identified region that is not densely populated. Having this specific deployment criteria can also promote competition and encourage subordinate licensing, by incentivizing larger carriers to work with smaller carriers that have the business case and expertise to deploy in rural areas. All license criteria should also include deployment requirements within and at the end of

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<sup>2</sup> Broadband Fund: Closing the digital divide in Canada. Canadian Radio-Television and Telecommunications Commission. Accessed October 8, 2021: <https://crtc.gc.ca/eng/internet/internet.htm>

<sup>3</sup> Final Report. Rural Connectivity Task Force. Agricultural Producers Association of Saskatchewan. March 2021. Page 5. <https://apas.ca/pub/documents/Advocacy%20and%20Resources/Rural%20Connectivity/rctf-final-report-final-web.pdf>

the term that would ensure continued rollout and timely use of the spectrum obtained. To spur access, CCGA supports the concept of such deployment requirements being an eligibility requirement for renewal of licences.

To further encourage competition, CCGA welcomes spectrum auctions at the Tier 5 level. This would allow more carriers the opportunity to participate in spectrum auctions as the service areas are smaller and deployment costs would be more competitive. Additionally, government funding that assists with deployment should be better coordinated with spectrum auctions and help ensure there's sustainable financial support to service those regions that do not demonstrate an economically profitable business case for deployment, and reduce thresholds to allow smaller providers and smaller projects to access funding. This can also promote competition within the sector.

## Conclusion

A lack of wireless coverage in rural Canada poses various challenges for canola farmers that impact the safety and prosperity of their farms. As the world becomes more reliant on online services, particularly during this pandemic, the need for reliable, affordable internet and mobile coverage are more important than ever. For the reasons discussed, CCGA stresses the importance of ensuring proper and timely deployment of spectrum to rural Canada to empower Canadian farmers and their operations for years to come. Canola farmers, and the agriculture industry more broadly, are strong contributors to Canada's economy and can contribute further and help meet Canada's sustainability goals if proper wireless access is obtained. The Industry Strategy Council has identified Canada's agri-food production as an important pillar to be leveraged to grow Canada's GDP through the use of modern agriculture technologies, such as precision agriculture. An outcomes-based approach that focuses on stringent deployment terms for rural Canada and supports competition will help solve these connectivity challenges and help seize opportunities in Canadian agriculture.

Sincerely,

Original signed by

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