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April 2, 2020

The Honourable Maryam Monsef  
Minister for Women and Gender Equality and Rural Economic Development  
Women and Gender Equality Canada  
P.O. Box 8097, Station T CSC  
Ottawa, ON K1G 3H6

**RE: Submission from the Rural Ontario Municipal Association (ROMA) on the Universal Broadband Fund (UBF)**

Dear Minister Monsef:

On behalf of the Rural Ontario Municipal Association (ROMA), I am writing to provide input from Ontario's rural municipal governments to Innovation, Science and Economic Development (ISED) regarding the design of the Universal Broadband Fund (UBF).

ROMA is the rural arm of the Association of Municipalities of Ontario (AMO). AMO is a non-partisan, non-profit association, that represents the interests of 444 municipal governments across Ontario. As the rural voice for AMO, ROMA takes pride in promoting, supporting and enhancing strong and effective rural governments across the Province.

ROMA and AMO work closely together on all matters of municipal interest in the Province. Given that broadband and cellular connectivity is a federal jurisdiction, ROMA typically works through the Federation of Canadian Municipalities (FCM) to ensure the rural voice is represented. This submission is no different, as ROMA is in broad alignment with FCM's submission that was delivered to ISED on February 27, 2020. However, the need for broadband and connectivity for residents and businesses in our rural communities is one of ROMA's biggest priorities and is why I am writing to provide supplemental comments from a rural Ontario perspective for your consideration.

At the federal level, ROMA is encouraged to see that meaningful progress is being made to achieve the Canadian Radio-television and Telecommunications Commission's (CRTC) basic service objective. The target to connect 100 percent of Canadian households to high-speed Internet by 2030, will make sure that Canada's rural, remote and northern communities have social, cultural and economic vibrancy. ROMA

welcomes the federal government's commitment of \$1 billion under the UBF as a strong step forward in connecting our underserved and unserved residents.

Municipal governments are the closest service providers to Canadians, and it is our council members that hear the connectivity challenges and needs directly from residents and businesses, regardless of the municipality's size. As a result, ROMA encourages ISED to consider communities of all sizes across all of Canada's provinces and territories in designing this fund.

In Ontario alone, approximately 43% or nearly 200 municipal governments have less than 5,000 residents. This means that there is a large variance between the more densely populated areas in the Greater Toronto and Hamilton Area. In fact, rural communities across the Province have difficulty accessing adequate telecom services – even in larger municipalities. The COVID-19 pandemic has only exacerbated the disparity and challenges to connectivity.

The need for reliable, accessible connectivity across Canada is more evident now, than ever. The COVID-19 pandemic has shifted workplaces from bricks and mortar, to remote workspaces, in a matter of weeks and made evident service challenges and gaps our communities have been experiencing for some time.

The move to telework en-masse has put incredible strain on smaller, northern, and rural municipal communities who do not receive broadband and cellular connection, and yet are being asked to depend on those services to access education online, to run businesses and work from home, and access healthcare. For all of these reasons it is critical that the roll-out of funding through the UBF be timely, given the urgent needs to tackle the digital divide across Canada.

ROMA has long advocated to telecommunication companies and government partners that all Ontarians deserve to have online connectivity. We hope that these comments will assist ISED in their design of the UBF to meet the unique needs of rural and remote communities.

### **Recommendations for ISED's UBF**

ROMA is fully supportive of FCM's responses to questions posed in ISED's stakeholder engagement materials. That includes the key recommendations provided under all categories (e.g. Program Design/Eligibility, Conditions of Funding, Assessment Process, Application Process, and Overall Program Design).

Additionally, ROMA supports the principles on broadband and cellular connectivity and the comments that were submitted by AMO on April 2, 2020. To reiterate, ROMA wants to echo recommendations that the program should be designed in a way that:

- Supports a *flexible approach* to funding that includes both backbone/transport and last mile (including mobile) as eligible categories

- Allows applications for *various combinations* of project elements (e.g. new builds, resiliency, and redundancy, etc.)
- Includes a key criteria for assessing a proposed UBF project that it addresses *actual, observed speeds and quality of service* (e.g. latency, not just download/upload speeds), rather than relying on theoretical speeds as per the existing hexagonal approach to mapping
- Provides funding eligibility for *partially-served hexagons* that the CRTC has excluded from its Broadband Fund, and assessed on the basis of more detailed geographic data
- Requires an assessment of the *affordability* of proposed projects, recognizing that cost is often a key barrier to equal access to broadband
- Works with other funding programs to ensure there is the *potential to increase the impact* of the various funding outcomes for the benefit of our communities, residents and businesses.

### **Timely Resources**

It is critical that these funding programs are implemented as quickly as possible and flow to projects in our communities so that they do not fall further behind. Ensuring that services improve in speed and affordability across Canada is critical and just as important as making sure new infrastructure is built.

Lessons learned and data from past funding programs, combined with the provincial and territorial programs, should be explored to maximize opportunities and optimize the available tools that unserved and underserved communities can use. In Ontario's case, the province released an Action Plan in July 2019 that included a \$150 million fund to connect up to 220,000 households and businesses. The timing of this fund has not been released, but it is *critical that stacking provincial and federal funds be permitted*.

This will help the small, northern and remote communities that the UBF is designed to help, but who do not have the same financial capacity and staffing resources to put together various applications. For example, approximately 43% of municipalities have less than 6 full-time administration staff to cover statutory (clerk, treasurer) and other duties.

For these reasons, ROMA encourages ISED to employ a harmonized application/administration process as much as possible as both the Province's Broadband Fund and the UBF are rolled out.

### **Conclusion**

ROMA is committed to working with all of our key broadband and connectivity partners such as FCM and ISED in the long-term to provide faster, better broadband and cellular services throughout Ontario and Canada. We encourage the UBF design

and implementation to continue, as we are seeing day-to-day in the current emergency, that these services are not luxuries. Broadband and cellular connectivity have become the basic building blocks of a modern, resilient economy and society. Doing this will be no small task, but the rewards will be worth it if we work together to create strong and efficient connectivity in Canada.

ROMA thanks you for the opportunity to provide Ontario municipal comments to the UBF. If you need clarification or further detail on these comments, please contact staff, Craig Reid at 416-971-9856 (x 334) or by email at [creid@amo.on.ca](mailto:creid@amo.on.ca), and Amber Crawford at 416-971-9856 (x 353) or by email at [acrawford@amo.on.ca](mailto:acrawford@amo.on.ca).

Sincerely,



Allan Thompson  
ROMA Chair  
Mayor of the Town of Caledon

cc: The Honourable Navdeep Bains, Minister of Innovation, Science and Industry  
The Honourable Mélanie Joly, Minister of Economic Development and Official Languages  
The Honourable Mary Ng, Minister of Small Business, Export Promotion and International Trade  
Simon Kennedy, Deputy Minister, Innovation, Science and Economic Development Canada  
The Honourable Laurie Scott, Ontario Minister of Infrastructure  
The Honourable Steve Clark, Ontario Minister of Municipal Affairs and Housing  
Jamie McGarvey, President, Association of Municipalities of Ontario  
Bill Karsten, President, Federation of Canadian Municipalities