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January 11, 2019

Broadcasting and Telecommunications Legislative Review Panel
c/o Innovation, Science and Economic Development Canada
235 Queen Street, 1st Floor
Ottawa, Ontario K1A 0H5

Dear Review Panel Members:

On behalf of the Rural Ontario Municipal Association (ROMA), I would like to respond to the Call for Comments as part of the Telecom Review Panel's consultation process. ROMA thanks the Panel for the opportunity to provide the rural Ontario context on this important matter.

ROMA is the rural arm of the Association of Municipalities of Ontario (AMO), with a mandate to discuss matters brought forward by the provincial and federal governments that affect rural communities in the province. It is for this reason that ROMA has been engaged in the joint review of the *Telecommunications Act*, *Radiocommunication Act*, and *Broadcasting Act*.

Today ROMA is writing in support of the submissions made to the Panel by the Association of Municipalities of Ontario (AMO), the Eastern Ontario Wardens' Caucus (EOWC), the Eastern Ontario Regional Network (EORN), the SouthWestern Integrated Fibre Technology (SWIFT) Network, and the Federation of Canadian Municipalities (FCM). In our view, it is critical that rural municipalities in Ontario, and across Canada, are integrated into the evolution of the broadcasting and telecommunications sectors.

ROMA has advocated for years that rural Ontario should have access to broadband and fixed wireless services on par with those available in urban centres. Broadband speeds must also be continuously re-evaluated to ensure they remain reflective of the latest technological developments. The need for equal access is only increasing given that today's world is highly digitized, and the vast majority of jobs are dependent on local access to broadband and internet connectivity. Students and businesses need this access to compete and thrive in the global economy.

To that end, ROMA supports the development of a national broadband strategy as a way to reduce barriers to access by all Canadians to advanced telecommunications networks. This strategy should include long-term predictable funding programs and partnerships with provincial and municipal governments. It should also involve identifying and updating service objectives at regular intervals to accommodate changes in all areas, including those in rural, remote and Indigenous communities.

ROMA is aware that telecom providers have historically and understandably prioritized dense urban areas when expanding broadband connectivity since rural regions present a smaller customer base and a slower return on investment for these for-profit providers.

However, rural areas in Eastern, Southwestern and Northern Ontario are working hard to support the expansion of infrastructure required to have high quality broadband and fixed wireless services. This is because we realize the detrimental economic and social costs to rural communities that are unable to connect to the internet.

While we recognize that there are financial challenges to enable improved access for Canadians in rural and remote areas, the future growth and prosperity of all communities is predicated on connectivity. As FCM states, in some cases the access to modern communication ensures the economic viability of entire communities.

As noted by FCM in its submission, the role of municipal governments in managing public space for the benefit of all users is a task that no other entity can perform – operationally or legally. That is why it is important to build on and enhance the long-standing partnership with municipal governments, including those located in remote, hard to reach regions.

After all, the continued demand on passive infrastructure associated with the rollout of current broadband technologies and the expected increase in demand for services will require continued cooperation between all owners of the infrastructure to ensure that the service demands of Canadians are met.

It does not, however, require changes in the legislation that would take decision-making away from municipal owners and assign the Canadian Radio-Television and Telecommunications Commission (CRTC), or any other group, to direct access and associated compensation.

During its joint review of these Acts, ROMA encourages the Panel to respect the integrity of the local taxpayer and not indirectly transfer costs for the deployment of telecommunications infrastructure on the municipal tax base. According to AMO estimates, municipalities in Ontario need an additional \$4.9 billion per year for ten years to continue delivering today's services and close the infrastructure gap. For almost half of Ontario's municipal governments, a 1% property tax increase raises less than \$50,000.

In summary, municipal governments are essential partners in achieving national connectivity objectives, and are committed to facilitating the timely, orderly and cost-

effective deployment of communications infrastructure. As such ROMA encourages the Panel to explore opportunities to reduce system-wide expenditures to the benefit of everyone, without creating a larger property tax bill for Canadians in order to help fund the services of for-profit telecommunications carriers.

We thank you for your opportunity to comment on this significant issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Allan Thompson", with a long horizontal flourish extending to the right.

Allan Thompson
Interim Chair, ROMA
Mayor, Town of Caledon

CC: Jamie McGarvey, President, Association of Ontario Municipalities
David Fell, CEO, Eastern Ontario Regional Network
Vicki-May Hamm, President, Federation of Canadian Municipalities
Geoff Hogan, CEO, SouthWestern Integrated Fibre Technology Inc.