Secretary General
Canadian Radio-television and Telecommunications Commission (CRTC),
Ottawa, Ontario
K1A ON2
February 7, 2016

Re: Invitation to comment on Notice 2015-134, Review of Basic Telecommunications Services.

Dear Ms. May-Cuconato:

Telecommunities Canada, established in 1993, is a community of practice about the uses of online networks for community development. Together with like-minded groups, our goal is to connect theory, policy and practice in ways that expand and improve the ability of communities to design their own future. Below please find our responses to the questions raised in your Notice 2015-134, Review of Basic Telecommunications Services .

1. What telecommunications services do Canadians consider necessary to participate in the digital economy?

Every community and every enterprise in Canada must now compete for business and talent in a *global* arena. Growth in productivity in that global arena has one common element, the Internet. But in Canada, the discourse around economic growth does not appear to take this into consideration. And Canada is consistently falling behind other developed nations both in speed and penetration of broadband access.[1]

Telecommunities Canada (TC) members believe that broadband Internet access must be part of basic telecommunications service. Such access must be equally available to all Canadians whether they live in urban, rural, or remote areas. It is as essential to social and economic development in the 21st century as sewage, clean water and electricity was in the late 19th and early 20th centuries.

It is our view that Canada is currently under-estimating the effectiveness of community-based broadband solutions. Canadian research has identified seven reasons for developing public broadband infrastructure as local infrastructure:
  • Broadband Internet access is an essential service
  • Public broadband access can spur economic development
  • Public broadband networks can improve efficiency within municipalities
  • Municipal broadband networks can stimulate competition and improve service in local telecommunications markets
  • The deployment of public broadband networks improves citizen access to the Internet and can help to bridge the digital divide
  • Public broadband networks can increase civic engagement both on and offline
  • The development of public broadband services can encourage local innovation [2]

One of our members from Sioux Lookout points out that, in this area, where community-owned broadband is a reality "Public broadband networks support the development and delivery of essential services such as e-health and e-learning in communities."

By designing broadband infrastructure as a public utility, communities can build networks that are open to all manner of competitors on equal and neutral terms and address barriers to participation - including availability, affordability, quality, and digital literacy - which prevent Canadians from meaningfully participating in the digital economy.

Even in the context of a national digital economy strategy that is "market-based," locally owned networks are facilitating increased access, encouraging competition, fostering consumer choice, providing a basis for broad based economic inclusion and driving local socio-economic development.[3] The CRTC should pro-actively support communities attempting to optimize the economic and social utility of networks. For example, it could *champion community owned broadband initiatives* as a way to engage with communities who are actively seeking to control their communications resources. There are a number of communities that have already taken on this role and others that are seeking to do so. [4] The CRTC should *provide a forum for discussion of such activities and assistance in helping them implement their goals.*

2. Which services do Canadians rely on the most to communicate?

Internet access is now essential for full participation in modern society. A 2015 Pew Research survey showed that 69% of Americans believe that people lacking broadband at home are at a major disadvantage in at least one of these five areas -- getting news and information, getting health information, learning new things, accessing government services or looking for job opportunities.[5]

This applies to Canada as well. A TC member from the Muskoka Lakes area only 200 km north of Toronto reported that a family member recently tried to join an online job fair. "There was a 'job' button to click on to see what jobs were available. It took at least 5 minutes for it to open. While it worked, it was slow-going and difficult to participate." On that particular day, the usual (and dismal) 3 Mbps download speed was down 1 Mbps and less then 1 Mbps for uploading. These stories indicate how essential it is to access health services, educational and job opportunities. With the development of adequate broadband infrastructure, residents of rural and remote communities will be able to access the same services as well-served urban communities.

Particular communication needs vary from region to region, from community to community and must be determined by the users themselves. They include tele-health, tele-education, e-commerce, e-banking, e-utilities, e-research, engaging in the political process, communicating with family, friends and government services. The capacity to perform these basic tasks must be built in to the public infrastructure of every community in the nation regardless of location.

Access to mobile services capable of supporting the full range of data, voice and video services is now required by most people across Canada. Unfortunately, mobile infrastructure continues to be a market-driven enterprise resulting in poor or non-existing service in remote and rural communities. Public and individual safety is put at risk as a result of the lack of these services in the regions that require these technologies and services the most.

In order that Canadians can make full use of all services, digital literacy skills must also be supported. In the words of one TC member from Nova Scotia: "Not just the equipment, software, connectivity etc, but the continued support to adequately realize its value."

3. Should the prices for telecommunications services in Canada be similar between urban and non-urban areas?

Basic services must be affordable for all. This is far from the reality for many Canadians. One TC member in rural Saskatchewan reported that "We are certainly not treated equally in rural areas as there is no competition for services. I pay over $100.00 per month for Internet service, $100.00 per month for a land line and $200.00 per month for a cell phone with family plan. These amounts are the norm for rural folks. We depend on the Internet to market our produce, communicate, do financial transactions as they are closing rural banks and credit unions all with unreliable service. Many folks are forced to discontinue their land lines because of the cost and stay with a cell phone but that is certainly lacking as there are dead service areas for long distances and no WIFI."

Many low-income Canadians and hard to serve communities will need assistance in these early stages of technological change. It may seem antiquated in the current competitive climate, but cross-subsidization of urban-rural systems was a common way of achieving this in the early days of telephony. We challenge the Commission to establish a funding mechanism to subsidize the deployment of broadband Internet access in areas where it is needed. The First Mile Connectivity Consortium (FMCC) is proposing a Northern Infrastructure and Services Fund (NISF) as a means of supporting these developments[6] and we wish to support their proposal.

Local ownership can help resolve some issues. Communities that build and operate their own networks can realize tremendous savings and better reliability. Where the market does not generate the optimal level of competition or investment in telecommunications infrastructure, the public and social enterprise sectors can step in to make investments, encourage competition and provide choice to users.

4. What upload and download speeds for broadband Internet service would meet Canadians' needs?

Current target speeds of 5Mbps download and 1Mbps upload are certainly not adequate. As an interim measure, these should be increased to match the current U.S. targets of 25Mbps. download and 3Mbps. upload -- actual, not advertised speeds. However, the Commission should acknowledge that this will not be adequate to fulfill the objectives of the Telecommunications Act and must commit to regular review and upgrading of this target.

There is no other way for our developed economy to sustain our current economic and social lifestyle but to become more productive. There is no better way to do this than by utilizing smart digital technologies. The public utility that develops and sustains the use of those technologies delivers fast and affordable broadband Internet access.

Sincerely
Marita Moll
in consultation with members of
Telecommunities Canada
www.tc.ca

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https://ca.news.yahoo.com/blogs/canada-politics/canadas-falling-behind-on-broadband-internet-195225479.html

2 Middleton, Catherine et al. (2008). Information and Communication Technology (ICT) Infrastructure as Public
Infrastructure: Final Report of the Community Wireless Infrastructure Research Project. Toronto: Ryerson University.
http://www.cwirp.ca/files/CWIRP_Final_report.pdf

3 U.S. Gov. The White House. (2015). Community-based Broadband Solutions; The Benefits of Competition and Choice
for Community Development and Highspeed Internet Access. The Executive Offices of the President. January.
https://www.whitehouse.gov/sites/default/files/docs/community-
based_broadband_report_by_executive_office_of_the_president.pdf

4 Chung, Emily. (2013) "Small Alberta town gets massive 1,000 Mbps broadband boost." CBC News. July 18, 2013.
http://www.cbc.ca/news/technology/small-alberta-town-gets-massive-1-000-mbps-broadband-boost-1.1382428

5 Pew Research Center. (2015). Home Broadband 2015. Dec. 21.
http://www.pewinternet.org/2015/12/21/home-broadband-2015/

6 McMahon, Rob. (2015). Intervention. Telecom Notice of Consultation CRTC 2015-134. Review of Basic
Telecommunications Services. First Mile Connectivity Consortium. July 14.
http://firstmile.ca/wp-content/uploads/FMCC-Intervention.pdf