



COMMUNICATIONS

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June 12, 2018

Cariboo Regional District
Board of Directors
Suite D, 180 North 3rd Avenue
Williams Lake, BC
V2G 2A4

Cariboo Regional District
File No.1855-01.....

JUN 15 2018

Referred Tocaolchair.....

Dear Board of Directors,

We are writing to inform you of an important consultation currently underway by Innovation, Science and Economic Development Canada (ISED). As a strong supporter of broadband access, it is important to voice your support for the preservation of the spectrum that enables broadband connectivity in your region.

ABC Communications currently offers broadband internet service in rural communities across BC using fixed wireless networks, built on our 3500 MHz spectrum licences. ABC has invested heavily in our networks to provide reliable high-speed access that meets the growing demands of families and businesses.

ISED plans to reclaim a portion of the spectrum in the 3500 MHz band and offer this spectrum to mobile carriers at auction. Small regional carriers like ABC Communications, who are dedicated to providing services in rural communities, may be negatively impacted by this process, depending on the outcome of this consultation. You can read more about the consultation (reference SLPB-004-18) [here](#).

ISED proposes two methods of reclaiming spectrum. The first (Option 1) would diminish ABC's spectrum licences. If enacted, this measure would damage not only internet service availability in your area, but would damage service levels, consumer choice, and competition across Canada.

With reduced holdings of this spectrum, ABC cannot continue to provide reliable high-speed services to our customers. The speeds we offer would be reduced, and the number of customers we could serve would be reduced.



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The second method (Option 2) would not diminish ABC's spectrum holdings.

We ask you to lend your voice to the efforts of rural service providers across Canada to preserve rural broadband services. Please find attached two letters that you may use as templates for your response:

1. A letter addressed to the Minister of Innovation, Science and Economic Development, Navdeep Bains; and
2. A letter addressed to ISED in response to the consultation process.

We ask that you send these letters before July 12, 2018, the deadline for submissions.

If you have any questions about this consultation, or its implications for rural broadband connectivity, please do not hesitate to call me.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Falko Kadenbach'.

Falko Kadenbach, Vice-President
ABC Communications



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The Honourable Navdeep Bains, P.C., M.P.
Minister of Innovation, Science and Economic Development
House of Commons Ottawa, Ontario
K1A 0A6

Dear Minister,

We are writing to encourage you to support and promote broadband connectivity in rural Canada.

The Government of Canada has committed \$500 million to rural broadband through the Connect to Innovate program. The CRTC has established a universal service objective for internet access. And the Standing Committee on Industry, Science and Technology published a report of 12 recommendations for bridging the digital divide in Canada.

Despite these and other expressions of support for rural broadband access, Innovation, Science and Economic Development Canada (ISED) is contemplating a measure that will reduce service levels in rural communities across Canada, and discourage future private investment into rural broadband networks.

Spectrum is essential for rural broadband access, and ISED is considering a reduction of spectrum from rural broadband network operators. Rural broadband service providers require more spectrum, not less.

In Gazette Notice SLPB-004-18: Consultation on Revisions to the 3500 MHz Band to Accommodate Flexible Use and Preliminary Consultation on Changes to the 3800 MHz Band, ISED presents the possibility (Option 1) of reducing the spectrum holdings of existing licence-holders in order to auction this spectrum for mobile use. This would result in service deterioration in rural communities.

ISED presents the alternative (Option 2) of reducing spectrum holdings to 50 MHz. This option will protect the existing broadband access of rural British Columbians in communities that are served by regional carriers.

We hope that you will consider the investments and commitments that the Government of Canada has made to bridging the digital divide in rural Canada, and urge ISED to preserve the existing spectrum holdings of rural broadband service providers by choosing Option 2 over Option 1.

We would like to thank you and ISED for moving ahead with the re-allocation and long-term licensing of the 3500 MHz band. This will make Canada a leader in 5G mobile while preserving rural last-mile services for Canadians.

Yours Sincerely,

Senior Director, Spectrum Licensing and Auction Operations
Innovation, Science and Economic Development Canada
ic.spectrumauctions-encheresduspectre.ic@canada.ca

Re: Gazette Notice SLPB-004-18: Consultation on Revisions to the 3500 MHz Band to Accommodate Flexible Use and Preliminary Consultation on Changes to the 3800 MHz Band

Access to broadband connectivity is critical to rural households in Canada. The vitality of rural and remote communities depends on our ability to participate in the digital economy and engage with friends, family, educational opportunities, and government services over the internet. Fixed wireless spectrum is crucial to rural connectivity.

[Organization Name] is deeply concerned about the proposed reduction of spectrum described in Option 1 (paragraph 46). Reducing the spectrum available for rural broadband networks will adversely affect broadband services in rural communities across Canada.

We urge ISED to choose Option 2 (paragraph 48), which does not reduce the spectrum holdings of small rural service providers. Better yet, we urge ISED to not reduce any spectrum holdings that are currently used for providing service in rural communities, and to make more spectrum available for providing fixed wireless services in rural communities.

We appreciate ISED's ongoing efforts to support rural broadband connectivity in Canada through funding programs. We encourage ISED to leverage these investments by ensuring that adequate spectrum will be available for last-mile broadband services.

Thank you for considering our submission.

[Signature]