

March 27, 2013

ONLINE SUBMISSION

John Macri, Director
Telecommunications Policy
Canadian Radio-television and Telecommunications Commission
Ottawa, ON

RE: Request for information (CRTC File: 8663-C12-201215302)

Dear Mr. Macri,

Thank you for the opportunity to provide additional information regarding our submission to the *Review of Northwestel Inc.'s Regulatory Framework, Modernization Plan and related matters* Telecom Notice of Consultation CRTC 2012-669, 6 December 2012, as amended by Telecom Notice of Consultation CRTC 2012-669-1, 15 February 2013. We present the CRTC's request for information here:

On page 3 of its intervention, First Mile Connectivity Consortium and K'atl'odeeche First Nation proposed that subsidies could be provided to support the development of First Nations community networks. Provide details on how the First Mile Connectivity Consortium and K'atl'odeeche First Nation see this new subsidy mechanism working, including what services or initiatives would be funded, who would be eligible to receive funding, how the funding amount would be determined, and the impact on the National Contribution Fund.

Please find attached our response to this request for information, submitted on behalf of the First Mile Connectivity Consortium and K'atl'odeeche First Nation.

We would also like to take this opportunity to request an opportunity to participate in the 19 June 2013 public hearing in Whitehorse to answer any questions the Commission may have regarding our submission. We also request a videoconferencing or teleconferencing link to enable remote participation in the hearings.

Also, pending funding, we can provide an expert witness who can elaborate on the approach taken by the Federal Communications Commission in the U.S., and its Office of Native Affairs and Policy.

Finally, we attach a letter of support for our submission from the president of the Eeyou Communications Network, a non-profit regional broadband network that services 14 communities in Northern Quebec, including the nine Cree Communications of Eeyou Istchee.

Sincerely,

Lyle Fabian
K'atl'odeeche First Nation

Rob McMahon
First Mile Connectivity Consortium

Background

1. As a small group of concerned citizens, we do not have the resources to put together a detailed proposal outlining a subsidy mechanism for First Nations Community Networks or hire counsel to assist in preparing this submission. However, we respectfully submit the following ideas for consideration, and suggest a call for further research and public comment on this issue.
2. Section 7 of the *Telecommunications Act* states several policy objectives associated with the regulation of telecommunications in Canada. Among other objectives, the Commission is mandated to facilitate the development of a telecommunications system that serves to:
 - a) “safeguard, enrich, and strengthen the social and economic fabric of Canada and its regions”;
 - b) “render reliable and affordable telecommunications services of high quality accessible to Canadians in both urban and rural areas in all regions of Canada”;
 - c) “enhance the efficiency and competitiveness...of Canadian telecommunications”;... and
 - h) “respond to the economic and social requirements of users of telecommunications services”.
3. In TRP 2011-771, the Commission stated its concerns regarding Northwestel’s failure to render reliable telecommunications services of high quality, as evidenced by aging infrastructure and the unavailability of services in many rural and remote communities. These concerns are further reflected in differential service levels inside Northwestel’s serving area, seen for example between Hay River and K’atl’odeeche First Nation. Given these conditions, the Commission determined that additional regulatory oversight is needed, and suggested that local competition be introduced in Northwestel’s serving territory. The Commission also stated that telecommunications provides residents of the North with economic development opportunities and public services.
4. In TRP 2011-291, the Commission established target speeds of 5 Mbps downstream / 1 Mbps upstream to be available to all Canadians by the end of 2015. We also acknowledge CRTC Decision 2013-135, but due to a lack of resources are unable to comment on it at this time. Finally, we welcome further details on how Northwestel might envision programs or services to support the First Nation Community Networks discussed in our submission.
5. After reviewing Northwestel’s revised *Modernization Plan* (6 February 2013), we concluded that the information presented in the publicly available version of the *Plan* fails to provide clear evidence of how the company will address the policy objectives stated in the *Act*, and reflected in TRP 2011-771. While we acknowledge Northwestel’s commitment to provide a level of service consistent with targets established in TRP 2011-291 to the 58 terrestrial communities in its northern service areas, we express concern that the company will only commit to speeds of 1.5 Mbps up / 384 Kbps down in the 38 satellite-served communities, a point also raised by another intervener representing Aboriginal communities, the Nunavut Broadband Development Corporation (para 5). Finally, given the socio-economic challenges faced by residents of many remote communities, we are concerned with the affordability of services like 4G, which may be priced out of reach for some households.
6. The *Plan* states that Northwestel is a major employer in the North, with more than 600 permanent northern residents on payroll (para 24). However, the company provides no details of the location of these employees inside its service region, and in particular in the 72

communities considered “remote”. It also does not provide details on the type of employment available in these “remote” communities, such as full time, part time, or contract work. Without access to this information, we assume that most full time Northwestel employees are located in regional centres like Whitehorse, Yellowknife and Hay River. We welcome additional details on this employment information from Northwestel.

6.1 We suggest that First Nations Community Networks (FNCNs) can support local employment by providing residents of communities with opportunities to work as administrators and technicians of infrastructure and associated services. FNCNs can also contribute to economic development efforts to circulate revenues inside a community (such as between local customers and service providers). Finally, FNCNs can support QoS guarantees by providing on-site points of contact.

7. The *Plan* describes Northwestel’s goals to facilitate wider deployment of 4G wireless, High Speed Internet and other service enhancements across the North (para 20). We agree these activities are an important and necessary component of a robust telecommunications system for the North. We also recognize these activities might increase the availability of access to services for users living in “remote” communities. However, we suggest that FNCNs can deliver ‘last-mile’ services that further support broader policy objectives, including the provision of jobs and economic development opportunities, and supporting competition, affordable services, and access.¹

7.1 The Assembly of First Nations’ e-Community Strategy outlines how First Nations can use community networks to achieve their self-government objectives.² The e-Community strategy demonstrates how last-mile connectivity solutions can be shaped to fit the needs of user communities.

7.2 Further to this point, we believe that the Commission and Northwestel can work with FNCNs to encourage competition, ensure affordable services, and support economic development and social benefits in communities. Examples of partnerships between backhaul service providers and FNCNs are already in place across Canada. For example, Slate Falls First Nation in Northwest Ontario provides residential Internet and VoIP telephone services through a Band-owned and operated service provider that leases backhaul from an external provider. As of 2011, residents paid \$60 per month for bundled phone and Internet services (after start-up equipment costs of approximately \$500). Revenues pay a local technician’s salary, purchase equipment, and subsidize phone and data services (including videoconferencing) for public and community service providers.³ Local government, residents, K-Net Services (a regional First Nations service provider⁴) and government funders all participated in the Slate Falls FNCN’s design.

¹ We acknowledge the economic development opportunities associated with recent drivers of demand for modern telecommunications in the North that are referenced by the Public Interest Advocacy Centre (PIAC) in one of its submissions, including “the expansion of the natural resources sector in the North, the growth of economic activity as trade routes in the North develop, as well as Canada’s activities to assert its sovereignty in the North” (submission filed 27 February 2013, para 30).

² For more information, visit: <http://www.afn.ca/index.php/en/policy-areas/first-nations-e-community>

³ Additional information about the early stages of this project is available here: <http://smart.knet.ca/satellite/slatefalls.html>

⁴ See: <http://services.knet.ca/>

7.3 The First Mile website (<http://firstmile.ca>) provides examples of more than 75 First Nations broadband projects from across Canada.⁵ For a summary of examples from First Nations in Northern Ontario, visit: <http://media.knet.ca/node/22318>. The First Nations Innovation website (<http://fn-innovation-pn.com>) presents 48 research publications that showcase similar work. Many of the projects profiled on these websites involve FNCNs.

8. In this context, we suggest the Commission consider calling for public comments concerning the establishment of a subsidy mechanism to support First Nations Community Networks (FNCNs) in Northwestel's operating territories. This mechanism might be based on modifications to the existing regulatory framework. It might include a portion of the National Contribution Fund set aside for entities to apply to for capital and operational funding support for FNCNs (including interconnection requirements). We put forward this suggestion in recognition of a potential requirement to eventually establish a body to administer funding. Finally, we suggest that in the future, this administrative body's mandate might extend to regions beyond Northwestel's operating territory (in the event of clear evidence of demonstrated need and benefit for FNCNs).

How a subsidy mechanism for FCNS is justified

9. In its *Plan*, Northwestel states that much of its planned deployment is contingent on external funding sources (para 57). For example, projects proposed in 26 of 83 communities that will receive 4G wireless upgrades (more than one-third, or 31%) are contingent on external funding to support capital costs (para 41-42).

9.1 First, we wish to express our concern that this contingent development plan may affect the timing, delivery, and availability of services to "remote" communities. As pointed out by another intervener, the Public Interest Advocacy Centre (PIAC), the *Plan* provides no guarantee of delivery of services within five years unless the company receives adequate funding (submission filed 27 February 2013, para 22-3).

9.2 Second, we note that Northwestel does not provide any details on who these third party funders are, or the amount of funding that it is requesting (para 58). We suggest that if these projects involve public sector funding partners, Northwestel (as a recipient of public funding) contribute support for a subsidy mechanism for FNCNs. We welcome further details on this funding from Northwestel.

10. Northwestel also states that it utilizes a number of different technologies in its service area, including satellite, fibre, and both high and low capacity microwave systems (para 151). In its *Plan* the company also determined "that for many small communities a fixed wireless solution is the most effective and cost efficient" technology (para 181). Given that the company currently utilizes a public and regulated resource (spectrum) to deliver its services, and plans to continue doing so in the future, we suggest that Northwestel contribute to a subsidy mechanism for FNCNs.

⁵ For more information on First Mile projects, see: <http://meeting.knet.ca/mp19/mod/book/view.php?id=1722&chapterid=2174> (also available in French). A peer-reviewed article in the *International Indigenous Policy Journal* on this topic is available here: <http://meeting.knet.ca/mp19/mod/book/view.php?id=1722&chapterid=2175>

10.1 This suggestion draws on a precedent established by Industry Canada in 1999 regarding Spectrum Management and Telecommunications Policy on 2500 MHz Multipoint Communications Systems.⁶ Industry Canada required that a company wishing to obtain access to 2.5GHz spectrum propose a ‘learning plan’ to “demonstrate how they can best meet the needs of the learning community within the operation of a viable commercial system” (p.29). Eligible criteria included specific infrastructure and funding. In the remote northern region of Nunavik, ‘last-mile’ connectivity is distributed by Tamaani (a regional ISP managed by the Kativik Regional Government) via 2.5GHz licensed wireless spectrum leased from Inukshuk Corporation. As a condition of securing the license for this spectrum, Inukshuk Corporation funded base stations that are owned and operated by Tamaani. We suggest that given Northwestel’s current and planned use of spectrum, residents of northern communities are entitled to a similar public benefit.

10.2 Further to this point, Northwestel plans to deploy fixed wireless (4G) infrastructure in many communities encompassed in its *Modernization Plan*. In the U.S., the Federal Communications Commission initiated consultations with Tribal entities regarding the status of communications towers, including mobile wireless towers, with regards to their “potential adverse impacts on Tribal sites of religious and cultural significance, or Tribal ‘sacred sites’” (p.5). We wish to acknowledge this point in light of Northwestel’s *Plan*.

11. Finally, in TRP 2011-771 the Commission determined that Northwestel would be responsible for the costs to implement local competition, including the provision of local number portability (LNP), subject to exceptions. As noted above, we acknowledge CRTC Decision 2013-135 regarding Northwestel’s recovery of local competition start-up costs, but given a lack of resources are unable to comment on it at this time. We suggest that FNCNs can support the Commission’s goal to encourage and facilitate local competition in Northwestel’s service area. In this context, TRP 2011-771 might justify a contribution from Northwestel to support a subsidy mechanism for FNCNs as a component of the “costs to implement local competition”. This proposal is supported by PIAC’s suggestion for the Commission to consider how improved transport networks may benefit individuals and small businesses (submission filed 27 February 2013, para 31-2).

How would the subsidy mechanism be administered

12. Following the Commission’s existing policy framework, we suggest that any new subsidy mechanism reflect similar objectives, while including specific consideration of the needs of rural and remote communities. These include:

- promoting fairness,
- economic efficiency,
- technological neutrality, and
- competitive equity.

13. The Commission might consider establishing an independent funding organization, or Office inside the Commission, to assess applications to a subsidy mechanism for FNCNs. To reduce any undue administrative burden placed on the Commission, we suggest the Commission consider putting out a call for public comments regarding the establishment of

⁶ See: [http://www.ic.gc.ca/eic/site/smt-gst.nsf/vwapj/MCS.PDF/\\$FILE/MCS.PDF](http://www.ic.gc.ca/eic/site/smt-gst.nsf/vwapj/MCS.PDF/$FILE/MCS.PDF)

such an organization and associated application criteria. We also recognize that such an organization entails costs and administrative overhead, and so a cost-benefit analysis might be required. We submit two examples of potential models for the Commission's consideration:

14. The first model is the Community Radio Fund of Canada (www.communityradiofund.org/). The CRFC is certified by the Commission to administer and distribute funds from Canadian Content Development Contributions to campus and community radio organizations. It is designated by the Commission to receive both voluntary and mandatory contributions from commercial radio broadcasters as a part of their licensing obligations. Since February 2009, the CRFC has awarded over \$1.7M to 78 recipients for 157 initiatives, chosen from more than 170 campus and community radio stations across Canada.⁷ Given that Northwestel's service area presently comprises 72 "remote" communities, and in recognition of the potential that over time a subsidy mechanism might expand to include other communities, we suggest the CRFC model is comparable in size and scope to that involved in administering a proposed FNCN subsidy mechanism.

- 14.1 The CRFC is available to all non-commercial, community, and community-based broadcasters in Canada, and their representative associations (as determined in CRTC Public Notices CRTC 2000-12, 2000-13, and 2010-499). The CRFC reviews applications from eligible entities and makes funding decisions according to published criteria. To avoid potential conflicts of interest, this review is undertaken by a committee of individuals with no direct link to applicants (or the associations representing them). Recipients of funds must use the subsidy to support stated policy objectives, such as producing locally-oriented content, supporting emerging distribution technologies, and providing capacity-building opportunities for community radio stations. These initiatives are deemed essential to community radio stations, but often difficult to fund from other sources.

15. A second model comes from the United States. The Office of Native Affairs and Policy (ONAP) is housed inside the Federal Communications Commission (FCC) (<http://www.fcc.gov/topic/native-nations>). ONAP is mandated to work with federally-recognized Tribal governments and Native organizations through regulatory action, consumer information, and community outreach. We suggest the Commission might consider establishing an internal Office to fulfill a similar role.

- 15.1 ONAP released its first (2012) Annual Report in March 2013.⁸ The FCC has jurisdiction to make Eligible Telecommunications Carrier (ETC) designations for providers serving Tribal lands. ETC status is required to access subsidies associated with the provision of high-cost and low-income universal services, including those associated with the Universal Service Fund (p.9).⁹ Applying a "one size fits none" policy, ONAP makes any decisions, including funding decisions, on a case-by-case

⁷ See: http://www.communityradiofund.org/index.php?option=com_content&view=article&id=79&Itemid=83&lang=en

⁸ For a press release about this Annual Report, visit: <http://www.grantcountybeat.com/index.php/news/news-releases/9745-udall-advocates-for-telecom-infrastructure-to-spur-economic-growth-on-tribal-lands>

⁹ These page references are taken from the *Federal Communications Commission Office of Native Affairs and Policy 2012 Annual Report*, available for download at: <http://transition.fcc.gov/cgb/onap/ONAP-AnnualReport03-19-2013.pdf>

basis, and consults with Tribal entities¹⁰, as well as carriers and providers that service Tribal lands.¹¹

15.2 Related FCC initiatives associated with Native Americans include:

- Establishment by ONAP of a Native American Broadband Task Force.
- Requirement for Eligible Telecommunications Carriers receiving Universal Fund Support to demonstrate that they have “meaningfully engaged” Tribal governments in their supported areas.
- A Broadband Lifeline pilot program to determine whether the Lifeline program can be extended to broadband to increase the adoption and retention of broadband by low-income households.
- Creation of a Remote Areas Fund of \$100M per year (many Native communities meet the criteria required to access this fund).

In its implementation of these initiatives, the FCC and ONAP work with Tribal governments and other entities to ensure they are aware of opportunities and have the requisite understanding of policy, technology, and FCC procedures.

Who would be eligible to receive funding

16. The Commission might consider establishing a Policy to determine what parties are eligible to apply for the proposed subsidy mechanism for FNCNs.

16.1 In terms of defining eligible parties, criteria for such a Policy might include considerations of cultural and social communities of interest, including First Nations. (Although our focus here is on First Nations, we do not want to exclude other affected communities). In this context, eligible funding for FNCS might include (but not be limited to) entities that:

- Are owned and/or operated by a community-based entity;
- Employ local residents as technicians or administrators; and
- Provide telecommunications, Internet, and other services to residents and local institutions.

16.2 A subsidy for FNCNs might include (but be not limited to) local loop (last-mile) infrastructure. The local loop terminates at a demarcation point that separates what a local entity owns, controls, and is responsible for, from what a telecommunications service provider owns, controls, and is responsible for.

17. Over time, we expect that established FNCNs will contribute to the ongoing sustainability of the proposed subsidy mechanism. Therefore, we suggest that in establishing its Policy, the Commission consider setting a limit (for example, a revenue-based cap), after which FNCNs begin contributing.

What services or initiatives would be funded

¹⁰ The specific definition of ‘Tribal entities’ might include but is not limited to Tribal governments and Native organizations.

¹¹ The FCC instated a Tribal government engagement obligation in 2013 (adopted in the context of universal service reform). According to ONAP: “Supported communications providers are to meaningfully engage with the governments of the Tribal Nations on whose lands they serve” (p.4). A list of specific criteria involved in this obligation is available on p.21 of ONAP’s Annual Report.

18. Any proposed FNCN subsidy mechanism must uphold the *Act's* objectives to balance adequate service with support for the economic and social requirements of Canadians. It must also uphold Section 7(f) of the *Act*, which states the objective "to foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation, where required, is efficient and effective".
19. Our research and professional experience offers many empirical examples of how FNCNs support local jobs, economic development opportunities, and service delivery, as well as health and education services and innovative IP technology. For example, in Northwestel's designated service area, K'at'l'odeeche First Nation is developing a community-owned and operated fibre optic loop. In the near future, the Band plans to install a 12km fibre optic cable connecting the community to existing Northwestel fibre.¹² This work benefits local residents by providing jobs and training, and through supporting community health and education services. Other examples of FNCNs are provided through the First Nations Innovation and First Mile websites described in section 7.3. We suggest that any FNCN subsidy mechanism support and encourage the kinds of innovative projects already taking place in First Nations and other communities across Canada.
20. As noted earlier, to assess services or initiatives associated with a subsidy mechanism for FNCNs, the Commission might consider employing a proposal-based model similar to that used in the existing regulatory framework. At present, in order to access its portion of the National Contribution Fund, Northwestel is required to generate Service Improvement Plans. (As outlined in CRTC Decision 2000-246 and CRTC Decision 2005-54). A similar approach might be applied to access a FNCN subsidy.
21. We recognize that communities face different levels of technical and administrative capacity that might impact their ability to apply for a subsidy mechanism, or develop and manage any resulting FNCN. For this reason, we suggest the Commission consider including support for local capacity-building initiatives as eligible expenses, potentially drawing on the model established by the FCC.

How the funding amount would be determined, and impact on the National Contribution Fund

22. In CRTC Decision 2000-745, the Commission established the *National Contribution Fund* (NCF). All telecommunications service providers contribute to the NCF based on their total Canadian Telecommunications Service Revenues (less certain deductions). Telecom Decision CRTC 2005-59 determined that the NCF provides compensation to incumbent local exchange carriers (ILECS) for the provision of their residential primary exchange service (PES) in high-cost serving areas (HCSAs).
23. In TRP 2011-291 and 2011-711, the Commission confirmed that only Northwestel is eligible to receive the portion of the NCF set aside for HCSAs in Canada's far north, given its

¹² Northwestel's *Plan* states that the company's preferred technology platform to service smaller communities (under 700 people) is a fixed wireless solution (para 39). However, the example of K'at'l'odeeche First Nation (and many other First Nations we have worked with) suggests other local loop solutions are possible, including fibre optics and cable infrastructure. Although fixed wireless is a lower-cost technological solution, we note that it should provide enough bandwidth to enable applications and services that support local economic development, such as cable television, videoconferencing, and VoIP. The target established by the Commission in TRP 2011-291 provides a benchmark for this.

regulatory obligation to serve all customers in those HCSA regions. In Telecom Decision 2012-669, the CRTC approved a total subsidy of \$20.9M for Northwestel in 2012. Northwestel received this subsidy to provide residential PES in HCSAs (\$10.8M), and to fund the ongoing requirements of the non-access portion of Northwestel's approved Service Improvement Plan (\$10.1M). As noted earlier, in TRP 2011-771, the Commission determined that Northwestel failed to provide adequate services to residents of its northern HCSAs (in particular those in "remote" communities).

24. In its *Plan*, Northwestel proposes to file annual reports that update the Commission on the company's progress (para 83). The Commission might consider requiring Northwestel to specify the communities and timeframe for upgrades, and establish associated Quality of Service standards (or other objectives or milestones) associated with the company's approved schedule.¹³ (We note that at this point the *Plan* does not provide clear metrics to measure performance or progress, as highlighted by PIAC (submission filed 27 February 2013, para 26), and welcome details on these metrics). The Commission might then impose financial consequences in the event that Northwestel fails to comply with these stated deliverables. These consequences might then be used to support a subsidy mechanism for FNCNs.

24.1 Further to this point, if the Commission determines that Northwestel has not provided an appropriate Quality of Service equal to the amount of the subsidy it has already received, a retroactive fine to the company might be used to support a subsidy mechanism for FNCNs.

25. We also suggest the Commission consider setting aside a portion of the NCF presently available for HCSAs in Canada's far north to establish a subsidy mechanism for FNCNs. There are several ways the Commission may envision such a mechanism working.

25.1 In one example, the CRFC receives a set percentage of contributions from the Canadian Content Development fund (as outlined in the 2010 Campus and Community Radio Policy). The Commission might consider developing a Policy to set aside a percentage of the component of the NCF designated for HCSAs in Canada's far north to fund an annual subsidy mechanism for FNCNs. Over time, this subsidy might be extended to FNCNs in other regions.

25.2 In another example, reforms to the Universal Service Fund (USF) in the U.S. included new opportunities for Tribes interested in self-provisioning telecommunications and broadband services to their lands (p.5). For example, the FCC established the Tribal Mobility Fund as a support mechanism for the deployment of mobile services. This Fund will distribute \$50M in one-time support to mobile service providers serving Tribal lands that currently lack 3G or 4G service. A second phase of this Tribal Mobility Fund will offer up to \$100M, designated annually and exclusively for support to Tribal lands (p.20).¹⁴ Tribal entities are eligible to access this support mechanism. In Canada, the Commission might consider applying

¹³ "Quality of service" in this case may include the definitions referred to in Northwestel's Revised Modernization Plan, as noted in paragraphs 10-12.

¹⁴ This activity includes the provision of training for Tribal entities regarding issues like funding eligibility, opportunities for joint ventures, and the mechanisms of the auction process. This is to ensure their broad and successful participation in consultations regarding the administration of these funds (p.4).

a similar model in the event that Northwestel is accessing public funding, as a condition of its plans to deploy wireless (4G) infrastructure and services.

26. We acknowledge the Commission's position that CLECs generally do not offer residential phone services in higher-cost locations inside regulated HCSAs, as stated in TRP 2011-291. However, we also acknowledge that the requirement for wireline services in communities with IP and wireless technologies has diminished with improvements in telecommunications technologies. Northwestel acknowledged that the infrastructure changes highlighted in its *Plan* may impact the cost of providing residential PES in HCSAs, and that the subsidy requirement may change accordingly (para 170).

26.1 Further to this point, although the existing NCF is associated with the provision of residential phone services, we note that the majority of Northwestel's *Plan* focuses on the deployment of data services, including High Speed Internet and Wireless (4G).

27. In this context, the Commission might consider setting up a new contribution fund for FNCNs associated with revenues arising from the emergent technologies and services provided in HCSAs in Canada's far north. Following CRTC Decision 2005-28, in Telecom Circular CRTC 2007-15, the Commission made revenues associated with Voice over Internet Protocol (VoIP) services eligible for contributions to the NCF. The Commission might consider setting up a new fund for revenues associated with Northwestel's *Modernization Plan*, such as 3G/4G mobile services. However, we are wary of the potential of such a Policy to stifle technical and service innovation.

Conclusion

28. In conclusion, it is our opinion that First Nations and Aboriginal peoples are best positioned to articulate their own broadband development needs. Our research and professional experience demonstrates how they are leveraging capital and operating funding support to self-provision telecommunications and broadband services, as reflected in many examples across Canada. We submit that these projects offer evidence that First Nations community networks can be strategically developed in partnership with backhaul service providers to reflect the unique requirements and needs of northern constituents. They can also generate economic development opportunities and provide broadband-enabled public services in rural and remote communities, as well as stimulate competition. The work presently being undertaken by K'atl'odeeche First Nation offers one example of this process taking place in Northwestel's service region. In this context, we submit that a subsidy mechanism to support the development and ongoing sustainability of First Nations Community Networks might support the Commission's policy objectives while enriching the next generation telecommunications system being developed to service Canada's far north.

We thank the CRTC for the opportunity to file this submission.

Respectfully,

First Mile Connectivity Consortium and K'atl'odeeche First Nation