

Q1a: Complete the following table with respect to all aspects of the First Mile Connectivity Consortium's proposal to amend the definition of basic telecommunications service to include broadband Internet service.

	Generally applicable	Other (certain regions, serving technology)
Minimum download speed (Mbps)		
Minimum upload speed		
Monthly data allowance (GB)		
Latency (ms)		
Other performance metrics (specify)		

Response:

1. We have noted in our submission that the CRTC's target speed of 5 mbps download and 1 mbps upload is not adequate for users today. Other organizations based in the rural, remote, and Northern regions where our members operate agree. For example, the Northwest Territories Association of Communities states: "... targets such as those identified in the 2014 report of the Northern Communications and Information Systems Working Group of 9 Mbps download and 1.5 Mbps Upload and 11 Mbps Download and 16 Mbps Upload for education and healthcare are more appropriate."¹
2. Also, broadband requirements are changing rapidly. Any specified speed should be considered a moving target. For example, the U.S. Federal Communications Commission (FCC) changed its broadband definition from 4 mbps download speed and 1 mbps up to 25 mbps down and 3 mbps up this year. We proposed that the CRTC also adopt this target.² Residents of Northern, remote, and rural regions should not be restricted from utilizing the innovative applications available to others in Canada on the basis of inferior broadband capabilities and availability.

¹ Intervention of the Northwest Territories Association of Communities in Telecom Notice of Consultation CRTC 2015-134, July 14, 2015, para. 7.a.ii.

² Intervention of the FMCC in Telecom Notice of Consultation CRTC 2015-134, July 14, 2015, para. 71-75.

3. The CRTC should review broadband speed and other targets including reliability and latency at least every three years.
4. We also believe that target speeds should apply for *all* Canadians, including those living in remote and Aboriginal communities. FMCC believes that broadband gaps need to be eliminated between rural/remote and urban residents, and between the remote North and the South. Broadband gaps should also be addressed inside Northern regions, such as between satellite-served and terrestrially-served communities.
5. We have also noted in our submission that affordability is critically important for broadband adoption and usage.³ Data caps can significantly increase the cost of usage and make access unaffordable for users who need broadband to access websites and cloud services and for online education – not simply for streaming entertainment video. Employees located in these regions – including entrepreneurs and professionals – should not be restricted from using broadband for their work, and students from using broadband for their education, because the service is not affordable.

Q 1b: *Provide the same information requested in part (a) with respect to First Mile Connectivity Consortium's proposal, if any, respecting a future target for broadband Internet service.*

Response:

1. Please see our response above: The CRTC should review broadband speed and other targets including reliability and latency at least every three years.
2. We also believe that target speeds should apply for all Canadians, including those living in remote and Aboriginal communities. FMCC believes that broadband gaps need to be eliminated between rural/remote and urban residents, between the remote North and the South, and inside the North.

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³ Intervention of the FMCC in Telecom Notice of Consultation CRTC 2015-134, July 14, 2015, para. 43-46 and other references.