



First Mile Connectivity Consortium
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14 August 2020

Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, ON K1A 0N2

RE: Telecom Notice of Consultation CRTC 2019-406 – Requests for Information from the First Mile Connectivity Consortium (“FMCC”)

Dear Mr. Doucet:

In accordance with the process established by *Telecom Notice of Consultation CRTC 2019-406* dated 10 December 2019 (amended 11 June 2020), the First Mile Connectivity Consortium (FMCC) files the enclosed Requests for Information addressed to the following parties:

- Bell Canada, on its own behalf, and on behalf of its affiliates
- Northwestel
- TELUS
- Rogers
- Shaw
- Cogeco
- SSi Micro
- Quebecor
- Eastlink
- Xplornet
- PIAC

The FMCC is an independent, incorporated not-for-profit national association, whose members are First Nation Internet service providers known as “community/regional intermediary organizations.” Our member organizations provide and support the delivery of broadband-enabled public services such as online education and telehealth, as well as entertainment services for household consumers. Our work focuses on innovative solutions to digital infrastructure and services with and in rural and remote regions and communities across Canada. More details about our members and activities are available at: <http://firstmile.ca> .

Sincerely,

Rob McMahon, Coordinator
First Mile Connectivity Consortium
info@firstmile.ca

Requests for Information for Parties (CRTC 2019-406)

General Questions for large commercial ILECs and CLECs (Bell, Northwestel, TELUS, Rogers, Shaw, Cogeco, SSi Micro, Quebecor, Eastlink, and Xplornet):

1. The Broadband Fund Guide notes that applicants must provide open access to one (or more) of three tiers of service: 100 MB, 1 GB, or 10 GB. Please specify the tier or tiers of service available to third-party service providers looking to extend services in rural/remote communities in High Cost Service Areas (or in Northwestel’s case, in its service territory).
2. Please state the number and percentage of communities in your company’s High Cost Service Areas (or in Northwestel’s case, in its service territory) that can access 10 GB tiered service.
3. Please state the length of time for provision of transport services in rural and northern regions requested by third-party providers in the following format over the time period from 2015-2019:
 - Shortest time in days or weeks from request to provision
 - Longest time in days or weeks from request to provision
 - Median time from request to provision (including number of requests)
4. The U.S. *National Broadband Plan* stated that “the FCC should improve the collection and availability regarding the location and availability of poles, ducts, conduits, and rights-of-way”.
 - Do you think the CRTC should also collect this information and make it available in a publicly accessible database?
5. Do you think the CRTC should collect information regarding ‘dark fibre’ networks that may be leased and activated by third-party providers, and make it available in a publicly accessible database?
 - If so, would your organisation contribute information on any ‘dark fibre’ networks that it owns and that may be leased and activated by third-party providers?
6. Would your organisation commit to training and hiring people from the Indigenous communities it serves to do installations, maintenance, repair, and other tasks, and to provide periodic training and upgrading as needed, and to employ local people on an ongoing basis?
7. In response to the need for more bandwidth for services to remote communities evidenced during the COVID-19 pandemic, would your organisation support the establishment of an emergency broadband fund specifically for the non-profit and Indigenous telecommunications providers that have been working to connect their communities in regions that otherwise lack sufficient projected return on investment for commercial operators to serve?

8. In the spirit of reconciliation and to support the development of sustainable economies in rural/remote Indigenous communities, would your organization commit to leasing network infrastructure that non-profit and/or Indigenous providers have either deployed or plan to deploy?
9. Would your organisation be willing to partner with non-profit and/or Indigenous providers on existing and/or planned projects to extend middle-mile infrastructure in rural / remote regions?

Questions for Northwestel:

1. Please provide rates charged to third party providers for bandwidth on the Mackenzie Valley Fibre Link (MVFL).
2. Please provide rates charged to third party providers under Wholesale Connect in the NWT and Yukon.
3. Please explain why the maximum available residential bandwidth is only 15 mbps download and 1 mbps upload in communities such as Fort Good Hope and Inuvik that are connected to the MVFL, as noted in the intervention made by the Inuvialuit Regional Corporation in these proceedings (intervention dated April 14, 2020).

Questions for Bell Canada:

1. Please specify the rates that Bell Canada companies pay for access to Hydro One poles in northern Ontario.

Questions for PIAC:

1. PIAC points out that the current regulatory regime is not functioning: “Unfortunately, the current incremental and collective (government-regulatory-industry) approach – reflected and supported by the CRTC Broadband Fund – is not working far or fast enough to bridge the rural broadband divide and could even be exacerbating it” (para 4).

PIAC goes on to state that: “PIAC submits that a new, non-incremental regulatory approach that effectively and efficiently improves and expands rural broadband connectivity, affordability, and adoption is urgently needed” (para 6).

What specific changes does PIAC propose at this point to develop this “new, non-incremental regulatory approach”?