

January 16, 2019

Mr. Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission (CRTC)
Ottawa, Ontario
K1A 0N2

Dear Mr. Doucet,

RE: Telecom Regulatory Policy CRTC 2018-377: Changing eligibility rules for stakeholders applying for funding for high-speed broadband internet access

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. Agriculture and agri-food businesses are leading economic drivers for the province, contributing nearly \$40 billion in GDP and employing over 822,000 Ontarians.

Reliable high-speed internet service is vital for modern farms to make business decisions, facilitate marketing of farm products, and operate on-farm technology. Rural communities must have access to broadband internet to stimulate economic development in a dynamic and competitive business environment. Our children must have access to learn. High speed internet is not a luxury – it is a necessity.

OFA was pleased when the CRTC classified “high-speed” internet access as a “basic service” and committed to providing internet speeds of at least 50 Mbps for downloads and 10 Mbps for uploads as a Universal Service Objective. OFA also commends the CRTC for providing \$750 million over the first five years to support projects to build or upgrade internet infrastructure for underserved Canadians. We fully recognize that rural broadband comes at a cost and needs some level of support to become a practical reality.

Unfortunately, the eligibility and assessment criteria used to evaluate applicants excludes “partially served” areas. Within each area of a prescribed 25 km² hexagon, if at least one household has access to 50/10 target speeds, it is considered “partially served”. “Partially served” areas are not eligible for funding. The process effectively eliminates the opportunity for broadband access to 100,000 Ontario families.

OFA is a proud member of the SouthWestern Integrated Fibre Technology Inc. (SWIFT) network and appreciates their efforts to bring high-speed internet to southwestern Ontario's rural and agricultural communities. OFA supports SWIFT's request for a review of the Broadband Fund criteria as issued by the CRTC. OFA shares SWIFT's concern and requests modification of the exclusive use of the 25km² hexagonal system used by Innovation, Science and Economic Development Canada (ISED) to map “served” and “underserved” areas as a base to determine eligibility for CRTC funding.

OFA supports SWIFT's recommendations in the appeal to the CRTC to help ensure all underserved Canadians have access to broadband funding:

- Redefine service area boundaries and allow all areas that are lacking access to be eligible to apply for funding, meeting the CRTC's "basic service" 50/10 thresholds;
- Allow lower levels of government and underserved communities to provide other evidence such as standardized internet measurements to demonstrate their needs and therefore eligibility to apply;
- Reconsider that in "partially served" areas, market forces are unlikely to improve connectivity anytime soon; and
- At a minimum, allow underserved areas in "partially served" zones to be eligible to apply as part of larger projects to incentivize private sector participation.

Rural Ontarians should not continue to be at a disadvantage to their urban counterparts. OFA supports SWIFT's request to the Commission to Review and Vary Telecom Regulatory Policy CRTC 2018-377 Development of the Commission's Broadband Fund.

Thank you for your consideration and please do not hesitate to contact us should you have further questions.

Sincerely,



Keith Currie
President

cc: OFA Board of Directors
Canadian Federation of Agriculture
Hon. Navdeep Bains, Minister of Innovation, Science and Economic Development
Hon. François-Phillippe Champagne, Minister of Infrastructure and Communities
Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
Hon. Monte McNaughton, Minister of Infrastructure