

April 22, 2020

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

Delivered via Fax: 1 819 994 0218

Dear Mr. Doucet:

On behalf of Sturgeon County, I am pleased to submit comment on the challenges that poor internet service places on rural communities, and the barriers to the deployment of broadband-capable networks in underserved areas of Canada.

Sturgeon County is a rural municipality located north of the City of Edmonton and is home to more than 20,000 residents. Within Sturgeon County's boundaries is the Alberta Industrial Heartland, the Canadian Forces Base (CFB) Edmonton, and a strong community of agricultural producers. Access to reliable internet and cell phone coverage is vital to the sustainability of our municipality including school students who are working remotely during the pandemic.

Sturgeon County faces challenges related to poor digital connectivity. We depend on broadband to attract new investment, support the competitiveness of our businesses, and to ensure our residents have access to online solutions in entertainment, health care, and education. The COVID-19 pandemic has particularly highlighted the difficulty broadband inaccessibility poses for our rural residents who struggle with these services, or to work from home due to slow and unreliable internet connections.

Sturgeon County has a lower development density; therefore, our community does not attract sufficient broadband services due to the high cost of infrastructure development and maintenance and because of lower market demand, compared to that of more densely populated areas in Canada.

I offer the following as input on barriers to the deployment of broadband-capable networks in rural areas, as per the CRTC's *Call for Comments* on the matter:

Self-reporting of Internet Speeds

Self-reporting of internet speeds from internet service providers is unreliable, resulting in some municipalities being excluded from programs that should otherwise qualify. Sturgeon County, for example, found itself in the position of not qualifying for previous programs even though the majority of the County falls below the minimum broadband speed standards.

Availability of Transport Networks to Rural Industry

Residential and business areas require access to the internet — this is made possible when local networks, often operated by internet service providers, have connection to broader transport

networks. Transport network infrastructure in most rural communities is limited, meaning connections must be built out over long distances—a cost prohibitive scenario. This lack of access and costs also place business parks and agribusinesses (which provide meaningful rural employment and economic stimulus) at a significant competitive disadvantage.

Return on Investment (ROI)

The short-term ROI focus of most telecommunication companies makes longer-term investments in broadband in rural communities unsaleable. Lack of federal funding to support the long-term maintenance of broadband infrastructure in rural areas is an additional barrier.

Under the current circumstance with COVID-19 social distancing restrictions, the effects of unreliable digital connectivity are especially pronounced. In our rural agricultural sector, many auctions have been moved on-line in response to the pandemic, and broadband limitations now make it difficult to buy or sell livestock and equipment. Rural residents required to self-isolate are also struggling to stay connected with friends and family, impacting mental health. As well, many students are struggling without internet connection to support remote school studies. These are only a few examples of the effect poor broadband connectivity can have during a period of heightened online reliance.

Providing reliable broadband service to rural communities requires a coordinated, strategic effort. In an attempt to avoid a piecemeal approach to the initiative, all relevant stakeholders (such as rural municipalities, internet service providers, provincial governments, and the CRTC) should collectively be engaged to achieve reasonable internet access, speed, and costs, which are currently a drag on rural economic competitiveness and prosperity.

Thank you for the opportunity to provide input on this important initiative. I look forward to the advancements the CRTC makes in improving broadband services in Sturgeon County and in other rural areas across Canada.

Yours sincerely,



Alanna Hnatiw
Mayor, Sturgeon County

cc: Dane Lloyd, M.P., Sturgeon River – Parkland
Honourable Nate Glubish, Minister of Service Alberta
Honourable Dale Nally, MLA, Morinville – St. Albert
Shane Getson, MLA, Lac Ste. Anne – Parkland
Council, Sturgeon County
Reegan McCullough, CAO, Sturgeon County
Bill Karsten, President, Federation of Canadian Municipalities
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Mark Plamondon, Executive Director, Alberta Industrial Heartland Association
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