



FERTILIZER CANADA

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October 26, 2021

Innovation, Science and Economic Development Canada  
Senior Director, Regulatory Policy  
Spectrum Licensing Policy Branch  
235 Queen Street (6th Floor, East Tower)  
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Via email: [spectrumauctions-encheresduspectre@ised-isde.gc.ca](mailto:spectrumauctions-encheresduspectre@ised-isde.gc.ca)

**Re: Canada Gazette, Part I, Volume 155, Number 33 - Notice No. SLPB-004-21 —  
Consultation on New Access Licensing Framework, Changes to Subordinate  
Licensing and White Space to Support Rural and Remote Deployment**

Thank you for this opportunity to provide comments on Innovation, Science and Economic Development Canada's (ISED) *Consultation on New Access Licensing Framework and Changes to Subordinate Licensing and White Space to Support Rural and Remote Deployment*. Fertilizer Canada represents manufacturers, wholesalers, and retail distributors of nitrogen, phosphate, potash, and sulphur fertilizers – the cornerstone of Canada's agri-food economy. The primary customers for our member companies are Canada's farmers, who frequently face barriers to connectivity due to their location in rural areas.

Fertilizer Canada and our member companies support the intent of the proposed changes, and we are pleased to see that the consultation document recognizes agriculture as one of the sectors that would stand to benefit from expanded spectrum access in rural and remote areas. As technology used on-farm advances, it is increasingly important that Canada's farmers are able to connect to reliable and affordable wireless telecommunications services. This has become even more apparent recently as the COVID-19 pandemic has necessitated a stronger reliance on Internet access not only for farmers, but for many Canadians in rural areas now working or studying from home. Farmers and other Canadians in rural areas would benefit greatly from expanded access to reliable high-speed Internet, and spectrum policy should heavily emphasize expanding access to high-speed Internet in the near-term to ensure that farmers can take advantage of advancements in on-farm technologies and remain competitive with their international counterparts.

Expanded spectrum access would also support the Government of Canada's emission reduction commitments. Agriculture has been identified as an important sector to help achieve these commitments, and a key barrier to adopting technologies shown to help reduce emissions on-farm, such as variable rate scripts, is the access to wireless communications to download and implement necessary software. Currently, software in planting and harvesting equipment has the capability to track increasing amounts of data every year to help farmers make more informed decisions on their input usage. However,



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with limited access to rural connectivity, implementing this technology is challenging and time consuming for many farmers.

While ISED's proposed changes are a step in the right direction, we believe that the policy could be more effective with the following adjustments:

- 1. We recommend that, as part of the proposed changes, ISED introduce standards that would require network builders to use licensed spectrum within 3 - 5 years, which would encourage faster deployment of spectrum in rural and remote areas.**
- 2. To further encourage building and deploying spectrum for rural areas, ISED should also consider applying a "Use it or Lose it"-style policy not only to the spectrum bands under consideration in this consultation, but to all bands and telecommunications companies. This would motivate telecommunications companies to put licensed spectrum to use as soon as possible, which would be greatly beneficial to rural and remote communities where connectivity is urgently needed.**

Thank you again for this opportunity to engage with ISED and provide feedback on the proposed measures to support rural and remote spectrum access and connectivity. Fertilizer Canada, our member companies, and their customers all know the importance of access to reliable and affordable high-speed Internet, and we strongly support the intent of the proposed changes. Please do not hesitate to contact us should there be any questions about the recommendations above.

Sincerely,

McKenzie Smith  
Director, Stewardship & Regulatory Affairs