



FERTILIZER CANADA

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Innovation, Science and Economic Development Canada
Spectrum Licensing Policy Branch
235 Queen Street (6th Floor, East Tower)
Ottawa ON K1A 0H5

Via email: spectrumauctions-encheresduspectre@ised-isde.gc.ca

Re: Notice No. SLPB-006-21 — Consultation on a Policy and Licensing Framework for Spectrum in the 3800 MHz Band (*Canada Gazette*, Part 1, December 25, 2021)

Thank you for this opportunity to provide comments on Innovation, Science and Economic Development Canada's (ISED) *Consultation on a Policy and Licensing Framework for Spectrum in the 3800 MHz Band*. Fertilizer Canada represents manufacturers, wholesalers, and retail distributors of nitrogen, potash, and sulphur fertilizers – the cornerstone of Canada's agri-food economy.

As recognized in the consultation paper, the deployment of 5G spectrum has important implications for industries including agriculture and manufacturing. Our member companies operate manufacturing and retail facilities that, in many cases, are located in rural areas without accessible high-speed internet. Additionally, the primary customers for our member companies are Canada's farmers, who frequently face barriers to connectivity due to their location in rural areas. We appreciate ISED's commitment to Canada's Connectivity Strategy, and we strongly support the objective of the proposed deployment requirements to facilitate the timely and efficient deployment of spectrum to all Canadians.

As technology used on-farm advances, it is increasingly important that Canada's farmers and the industry sectors that serve them 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. **We believe that 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 in rural and remote areas 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



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

While some of the specific and technical aspects of the licensing framework are beyond the scope of Fertilizer Canada and our members, we have outlined the following recommendations focused on advancing spectrum deployment in rural and remote areas:

- 1. Fertilizer Canada strongly encourages ISED to implement “use-it-or-lose-it” deployment conditions that would require spectrum licensees to put their allocated spectrum to use within a prescribed time period in order to maintain their license.** This would push carriers to build out 5G networks in a timely manner and facilitate access to high-speed Internet and mobile networks for Canadians in rural and remote areas. In cases where a carrier fails to meet their deployment requirements, their license would be revoked and made available for another carrier to purchase.
- 2. Fertilizer Canada recommends implementing caps on the amount of spectrum available for each carrier to purchase as opposed to “set asides”.** We believe that caps will better support the needs of rural communities as this policy would ensure that the carriers who are capable of deploying spectrum are able to purchase licenses. Set asides, by contrast, can result in spectrum being held by or for carriers who have limited ability to actually deploy a network.
- 3. Fertilizer Canada encourages ISED to establish basic minimum standards for service and to consider setting accelerated timelines for these standards to be met specifically in underserved rural and remote areas to ensure that Canadians living and working in these areas can access this vital public resource.** We believe this is an important step to support ISED’s objective of facilitating the deployment and timely availability of services in rural, remote, and Northern regions.

Fertilizer Canada, our member companies, and their customers all know the importance of access to reliable and affordable high-speed Internet, and we thank ISED for the continued commitment to ensuring that this vital public resource is deployed effectively in the areas where it is needed most. Please do not hesitate to contact us should there be any questions about the recommendations above.

Sincerely,

McKenzie Smith
Director, Stewardship & Regulatory Affairs