



March 18, 2019

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

**RE: Telecom Notice of Consultation 2019-45 - Call for Comments - Application Guide for the Broadband Fund**

Dear Mr. Doucet,

Cybera is a not-for-profit, technology-neutral organization responsible for driving Alberta's economic growth through the use of digital technology. Its core role is to oversee the development and operations of Alberta's cyberinfrastructure — the advanced system of networks and computers that keeps government, educational institutions, not-for-profits, business incubators and entrepreneurs at the forefront of technological change.

Cybera is pleased to provide comments on the Preliminary Application Guide for the Broadband Fund. In Telecom Regulatory Policy CRTC 2018-377, the Commission stated that "requirements that are too onerous may preclude small applicants from being able to apply for funding from the Broadband Fund." Cybera seconds this view, and calls on the Commission to ensure that the Application Guide, as well as standards for providing on-call assistance to applicants, do not create unfair barriers to smaller applicants and/or First Nations applicants.

Eligibility for, and assessment of, the Broadband Fund is naturally a complex process, requiring applicants to provide the Commission with highly technical information. The Commission should be aware of how this process might disadvantage smaller applicants with lower operating budgets. Providing such applicants with a streamlined and intuitive Application Guide may bridge this divide. In addition, Cybera recommends that, for smaller applicants and First

**CYBERA**

Calgary Office: Suite 200, 3512 - 33 St NW, Calgary, AB T2N 2A6 T: 403-210-5333  
Edmonton Office: 3-43, Computing Science Centre, University of Alberta, Edmonton, AB T6G 2E8  
@cybera info@cybera.ca www.cybera.ca

Nations applicants, the Commission should make an allowance for these applicants to rectify any deficiencies in their applications prior to being denied funding.

Cybera recommends that the Commission attempt to issue, to the greatest extent possible, an Application Guide that is straightforward, intuitive and accessible. To achieve this, the Application Guide should provide clear directions to applicants regarding the Commission's overarching goals, priorities, and full eligibility and assessment criteria at a reasonable timeframe prior to the call for applications. In addition, eligibility requirements with respect to geography and service characteristics should be clearly defined and easily accessible to applicants within the Application Guide.

Cybera sees several opportunities to improve the Preliminary Application Guide in these respects;

- In *“Section 4.3 Geographic Eligibility”*, the Commission should provide information to applicants to help them determine their geographic eligibility prior to a call for applications for the Broadband Fund. For small applicants, the burden to conduct individual research to determine their geographic eligibility may be onerous and unfair. Geographic eligibility should be determined based solely on public information that is shared universally among all applicants.
- In *“Section 4.5, Communication with Applicants”*, the Commission should revisit the determination to provide no substantive assistance to applicants during the eligibility phase of the application process. Cybera recommends that the Commission make special consideration for applicants based on community characteristics (e.g., First Nations communities) and operating budget.
- In *“Section 6.1.2(c) Community Consultation and Level of Support”*, the Commission should more clearly define the responsibilities of applicants with respect to community consultations, as well as more clearly indicate the assessment standards that will be applied to consultations that have been undertaken. Conducting individual community consultations may be a burdensome process for smaller applicants.

CYBERA

Calgary Office: Suite 200, 3512 - 33 St NW, Calgary, AB T2N 2A6 T: 403-210-5333  
Edmonton Office: 3-43, Computing Science Centre, University of Alberta, Edmonton, AB T6G 2E8  
@cybera info@cybera.ca www.cybera.ca

- In “*Section 9.3 Claims and Payments for Eligible Costs*”, the Commission has set three months as the minimum reimbursement period for recipients. Cybera recommends that the Commission allow for special consideration for those recipients who have lower operating budgets, or whose projects require significant operating expenses, for whom a three-month reimbursement period may be too long.

Cybera thanks the Commission for its consideration of the above-stated recommendations. We believe that the Broadband Fund is an essential program to ensure all Canadians have access to the Commission's universal service objective, and to close Canada’s digital divide. To achieve this, Cybera reiterates its call for the Commission to provide an intuitive and accessible Application Guide to all applicants of the Broadband Fund, with a view to assist smaller and/or First Nations applicants to encourage and enable their participation.

\*\*\*END OF DOCUMENT\*\*\*

CYBERA

Calgary Office: Suite 200, 3512 - 33 St NW, Calgary, AB T2N 2A6 T: 403-210-5333  
Edmonton Office: 3-43, Computing Science Centre, University of Alberta, Edmonton, AB T6G 2E8  
@cybera info@cybera.ca www.cybera.ca