



February 8, 2019

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

RE: SWIFT Petition to Vary Telecom Regulatory Policy CRTC 2018-377 *Development of the Commission's 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 regarding the application from Southwestern Integrated Fibre Technology Inc (SWIFT)' to modify certain eligibility and measurement elements of the Broadband Fund, as defined in Regulatory Policy CRTC 2018-377. Cybera agrees with SWIFT's view that certain aspects of the Broadband Fund's eligibility criteria, namely the use of 25km² hexagonal units and the ineligibility of "partially served" areas, are problematic.

While Cybera commends the Commission for implementing the Broadband Fund, its current framework departs in several respects from recommendations proposed by Cybera in response to the Commission's Notice of Consultation CRTC 2017-112: Development of the Commission's Broadband Funding Regime. In our submission, dated 28 June 2017, Cybera remarked that;

"The current 25 square kilometre hexagonal units are not ideal for defining geographic eligibility. Geographic units don't take into account actual population density or distribution and only make sense when the population is uniformly distributed across the entire hexagonal unit. Most importantly, the threshold of one serviced household indicating [that] the entire unit is served is problematic. Service coverage needs to be as granular as individual households."

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For this reason, Cybera supports and seconds each of SWIFT's four recommendations as outlined in their application:

- Redefine service area boundaries and allow areas that are lacking access to meet the Commission's "basic service" 50/10 thresholds as eligible to apply for funding.
- 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 not "likely" to improve connectivity anytime soon.
- 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.

Having said this, Cybera proposes that the above recommendations should be considered only in a manner consistent with the Commission's stated goal to fund "priority underserved areas." Cybera supports the Commission's current priority to fund eligible geographic areas where no service at the universal objective standard is available. While Cybera supports SWIFT's recommendation that partially served areas be designated as eligible for funding, Cybera recommends that the Commission consider this only in a manner such that the possibility of funding being removed from priority underserved areas is mitigated.

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