Dear Sir/Madam,

It is a pleasure to write to you as part of the consultation process for the above-referenced 700 MHz spectrum auction. I wish to highlight its specific relevance for rural southern Ontario. I am writing this letter as a researcher in the Ontario Agricultural College. My research examines the use of information and communication technologies for social and economic development of rural areas.

This letter will focus on two main points:

First, it is recommended that a spectrum auction strategy prioritize significantly improved rural quality of service and affordable access to new information and communication technologies. This is consistent with the primary policy objective of Industry Canada. Furthermore, an action agenda from IC is needed to ensure that some of the revenues generated from spectrum auctions be used to advance digital development in the rural and agri-food sectors.

Given the nature and characteristics of the 700 MHz band there are potentially important contributions to agri-food and rural innovation. These include more cost-effective carrying capacities, higher speeds, superior data propagation and penetration of the signal through physical barriers (barns, etc.). The decision-making process needs to be aware and respond to the importance of investments that will lead to greater partnerships between the agri-food rural sector and the wireless telecom industry. Discussions between these industries have been rare and disparate. Support for rural-focused stakeholder consultations is a priority – especially for decisions being made this year that will affect agricultural and rural communities in years to come.

It is also recommended that existing conditionalities on spectrum auction (mandatory roaming provisions, set-asides for local, independent telecos and genuine/new entrants,
antenna tower sharing and build-out requirements) prioritize significant improvement of quality of service and affordable access in rural areas. These conditionalities require careful, local context-specific analysis and consultation in the process of spectrum allocation. Specific mechanisms IC might consider are: mandatory on-going local consultations by incumbents, penalties for non-use of spectrum and spectrum-splitting options where non-use occurs.

In conclusion, I re-state the importance of the 2012 auction spectrum for advancing agri-food and rural innovation. In effect, this submission calls upon IC to ensure that all Canadians and the food and natural resource systems they depend upon benefit from investment in world-class networks and the latest information and communication technologies.

Yours sincerely,


Helen Hambly Odame, PhD
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