

Benjamin LaHaise

- 1 As a resident of Lanark Highlands township, I am pleased to appear before the CRTC today. Given my background in the technology industry, my experience working with and starting ISPs, as well as deploying my own wireless and fibre optic last mile infrastructure, I feel that I can share some insight into the issues that leave residents of my community unserved and under-served.
- 2 Lanark Highlands is a township located approximately 90 km south-west of Ottawa. It is characterized by a hilly terrain mixed with plenty of trees and farmland. It is the north-western most township in Lanark County, and it is predominantly rural. The concerns surrounding the provision of broadband internet access in this area are quite similar to those brought forward to the commission by other municipalities¹. That is to say, there are small pockets of served customers in the higher density areas of the county (like the village of Lanark and the town of Perth), while just a few kilometres away there are many residents with no viable form of internet access.
- 3 In my community, the “missing pieces” are the gaps in the so called “last mile” infrastructure. Thanks to the efforts of organizations like Eastern Ontario Regional Network (EORN²) over the last few years and the deployment of ATM based services in the late 1990s/early 2000s³, Lanark County is relatively well connected to the incumbent's⁴ transport network.
- 4 However, despite the work by EORN to improve the access market in eastern Ontario over the past decade, the coverage maps⁵ of the Connecting Canadians program still show that in Lanark Highlands township, 40% of households (868 out of 2136) remain underserved! For example, from the CRTC's own Broadband Internet Service Coverage map⁶, the hexagon in which I reside in is shown as covered by fixed wireless service and DSL. What the map does not illustrate are the distance limitations of DSL, as well as the potentially excessive costs of tower installation⁷ for

1 Including those of Milton Councillor, Ward 3 (Nassagaweya) (#220) and Député de Mégantic-L'Érable (int. #489)

2 Eastern Ontario Region Network <https://www.eorn.ca/en/index.asp>

3 PACTS Case Study of Lanark Communications Network <http://knet.ca/documents/PACTS/LCN.PDF>

4 Bell Aliant

5 From [https://www.ic.gc.ca/eic/site/028.nsf/vwapj/Detailed_Maps_Ontario.zip/\\$FILE/Detailed_Maps_Ontario.zip](https://www.ic.gc.ca/eic/site/028.nsf/vwapj/Detailed_Maps_Ontario.zip/$FILE/Detailed_Maps_Ontario.zip), specifically the Targeted_Households_Spreadsheet_ONTARIO.XLSX spreadsheet filtered for records in Lanark Highlands.

6 <http://www.crtc.gc.ca/eng/internet/internetcanada.htm>

7 Tower cost of \$1200 from Intervention #522 by Benjamin LaHaise, paragraph 8 <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=2537470>

wireless (\$1200 for a single residential household*), and the comparatively meagre data caps of the the fixed wireless provider.

5 Given the technologically constraining nature of the terrain and tree coverage, it is essential for there to be an option for residents to obtain a wireline based internet service. That must be the case, since, for so many residents, there is no other option.

6 If it is accepted that there are some users who can only be served by a wireline technology, then it stands to reason that the commission must make it economically viable for ISPs to deploy fibre in rural areas.

7 Whether those services are provided by the incumbent or by a community based group, the deployment strategy must be economically efficient. This means that it must be possible to reuse existing infrastructure wherever possible.

8 Specifically, this necessitates the economic use of existing central offices, transport and support structures in rural areas. The commission has taken action of this nature in the past to enable the existence of CLECs through the use of incumbents' copper local loops, but similar rules do not exist for residential fibre access over incumbents' facilities – even in the case where those facilities were built with subsidies, and pass right by the doorsteps of the underserved.

9 Furthermore, in the case of support structures in rural areas, the cost of permits needs to be both predictable and reasonable. Urban areas measure density in terms of customers per pole, while rural areas are measured in poles per customer. Given the significant benefits the incumbents have exploited over the years from their use of public rights of way, it seems only fair that they be obligated to remove numerous obstacles for other providers to serve rural households where they themselves have chosen not to.

10 As mentioned in other interventions, there is a role for community based organizations in helping to fill the service gaps across the country. Any actions that the commission can take to assist these organizations will foster growth and improved access in communities across Canada, as no single entity can address the significant gaps in connectivity by itself.

11 Thank you for your time today, and for allowing me to speak before the commission. I am happy to answer any questions.

* however subsidized or amortized by the provider over lengthy contract terms