



1910 Saskatchewan Avenue W.  
Portage la Prairie, MB R1N 0P1  
Ph: 204-857-8666  
Email: [amm@amm.mb.ca](mailto:amm@amm.mb.ca)  
[www.amm.mb.ca](http://www.amm.mb.ca)

July 12, 2023

Canadian Radio-television and Telecommunications Commission (CRTC)  
Ottawa, Ontario K1A 0N2  
Via email: [FLB-BBF@crtc.gc.ca](mailto:FLB-BBF@crtc.gc.ca)

Re: Broadband Fund Policy Review

To Whom It May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), which represents all of Manitoba's 137 municipalities, I would like to provide some comments regarding the Broadband Fund Policy Review.

Firstly, the AMM is pleased to participate in the Commission's Review of the Broadband Fund policy as well as supports the Broadband Fund and its continuation. However, with that said, many Manitoba municipalities have, in large, not been able to leverage federal funds to a significant degree due to various reasons, primarily attributed to financial pressures, local capacity and resource issues, and complex program requirements.

The COVID-19 pandemic underscored many vulnerabilities throughout Manitoba and Canada as a whole, although perhaps one of the greatest vulnerabilities is the heightened digital divide between communities and the need for better broadband access, so all residents have equal access to high-quality internet services. Thus, the AMM welcomed the CRTC's decision to recognize broadband internet access as a basic service across Canada as well as its commitment to fund projects in areas that currently do not meet new target download speeds.

Meanwhile, the pandemic has resulted in a greater push for e-services, yet Manitoba continues to experience some of the slowest internet download speeds in the country. The geographical and proximity disparities among rural, remote, and northern communities make it expensive to establish and maintain broadband infrastructure. Consequently, municipalities often rely on partnerships with internet service providers (ISPs) to apply for broadband funds, further driving up costs for local communities who have limited human resources, finances and tax bases to respond to residents' needs. Ultimately, these expenses are transferred to rural and remote customers, creating disparities that not only hinder public safety, newcomer attraction and retention but also impede economic growth. As such, operational funding would be welcome as it could help defray the costs on customers in rural, northern, and remote areas of Canada. However, it is crucial to have clear and explicit guidelines accompanying the use and duration of these funds.

Moreover, the AMM welcomed the Universal Broadband Fund (UBF) to support broadband connectivity. In November 2022, the federal government also announced a \$475 million top-up to the UBF that now totals \$3.225 billion. Since this fund's establishment, **only \$9.6 million** has been allocated to Manitoba according to the selected UBF projects webpage. It is essential that Manitoba



1910 Saskatchewan Avenue W.  
Portage la Prairie, MB R1N 0P1  
Ph: 204-857-8666  
Email: [amm@amm.mb.ca](mailto:amm@amm.mb.ca)  
[www.amm.mb.ca](http://www.amm.mb.ca)

receive its proportionate share of funds, and these funds be maximized at the local level to fill the most pressing connectivity gaps across the province. The AMM also recommends the creation of a single-window intake process to access all federal broadband funding streams to make the process more accessible to all applicants.

Further, the AMM supports the FCM's recommendation of establishing a national target for digital affordability that reflects the diverse economic realities of communities across the country, as an essential counterpart to Canada's existing universal service objective for fixed broadband speeds. We also reiterate FCM's call for a municipal digital capacity-building program to develop technical expertise and support local and regional broadband infrastructure planning and deployment in underserved communities. Reliable broadband connectivity plays a crucial role in the future productivity growth and economic development of municipalities. By addressing this critical need, we can empower communities to thrive and enhance their overall well-being.

Thank you for the opportunity to provide these comments. The AMM will continue to advocate on behalf of its members to ensure communities of all sizes have equal access to broadband connectivity.

Yours sincerely,

Denys Volkov  
Executive Director

- cc: FCM President Scott Pearce  
Liberal MP Dan Vandal  
Liberal MP Kevin Lamoureux  
Liberal MP Terry Duguid  
Liberal MP Ben Carr  
Conservative MP Dan Mazier  
Conservative MP Larry Maguire  
Conservative MP Branden Leslie  
Conservative MP Marty Morantz  
Conservative MP Raquel Dancho  
Conservative MP James Bezan  
Conservative MP Ted Falk  
NDP MP Leah Gazan  
NDP MP Daniel Blaikie  
NDP MP Niki Ashton