Canadian Telecommunications Association
Association canadienne des télécommunications

March 16, 2026

Mr. Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
1 Promenade du Portage
Gatineau, QC K1A 0N2

Submitted electronically

Dear Mr. Morin,

Subject: Telecom Notice of Consultation CRTC 2026-9, Call for comments – Mobile reporting standard, Reference: 1011-NOC2026-0009

Please find in the enclosed Appendix comments of the Canadian Telecommunications Association regarding the above referenced matter.

To the extent that any comments in this submission conflict with a comment of an Association member, the comment of the member shall prevail with respect to that member.

Kind regards,

Eric Smith

Eric Smith
Senior Vice President

Appendix: Response to questions from TNC 2026-9

Report by the Communications Research Centre

Q1. What are your views on the proposed CRC technical mobile coverage standards and new coverage definitions, metrics, and criteria?

1. The Canadian Telecommunications Association (the "CTA") agrees that accurate and transparent mobile coverage information is important. Coverage maps play a valuable role in helping consumers make informed choices and in supporting evidence-based policy. In the highly competitive mobile wireless market, service providers are already strongly incentivized to model and present their coverage as accurately as possible. Inaccurate or overstated coverage claims would lead to customer dissatisfaction, increased complaints, reputational harm, and higher churn; outcomes that run directly counter to business interests. Providers succeed by delivering reliable service and positive customer experiences, not by overstating network performance. Market dynamics therefore reinforce the importance of realistic and responsible coverage representations, independent of additional prescriptive regulatory requirements.

2. The Canadian Radio-television and Telecommunications Commission (the "Commission") appears to premise its proposed implementation of a new mobile coverage standard on public opinion research regarding perceived coverage gaps (referenced in the third paragraph of the Notice of Consultation),[1] without first identifying deficiencies in existing modelling practices or reporting standards. Public perceptions of coverage gaps are influenced by many external factors that are outside the control of service providers, not from flaws in how carriers' model or report their networks. These include device capability, indoor signal attenuation, terrain and topography, building materials, weather conditions, trees and foliage, and momentary network congestion. These variables will continue to affect individual use experience regardless of how coverage projections are defined or standardized.

3. Highly prescriptive technical standards, definitions and modelling criteria will impose increased costs and administrative burdens on service providers. This will divert resources from network expansion and modernization; the very things that improve coverage and performance. The Commission should carefully consider these trade-offs, particularly given that stricter modelling requirements will not resolve the underlying external factors that shape customer experience.

[1] Telecom Notice of Consultation CRTC 2026-9, *Call for comments – Mobile reporting standard*, 15 January 2026, at para 3.

4. If the Commission proceeds with revised standards, the focus should be on ensuring consistency and clarity in reporting formats and high-level definitions rather than regulating the specific modelling tools or methodologies carriers use. The standard should also rely on power-level metrics rather than service-level metrics. Service-level metrics are point in time measurements which are more complex and influenced by variables such as device capability and network load, making consistent modelling difficult. Power-level thresholds provide a clearer, more objective, and technically feasible basis for defining coverage levels.

5. Equally important will be how new standards and resulting maps are presented to the public. The Commission's and the Department of Innovation, Science and Economic Development Canada ("ISED")'s coverage maps must be presented with appropriate context and explanation of their inherent limitations, including the external factors that affect user experience. Over-promising precision risks undermining consumer trust rather than strengthening it.

6. In summary, any regulatory measures should correspond to clearly identified deficiencies in current reporting practices, not to generalized perceptions of mobile coverage gaps. If no systemic flaws in modelling or reporting can be clearly identified, then imposing new highly prescriptive standards is not justified. If the Commission proceeds with new measures, the focus should be on promoting consistency and clarity in reporting formats and high-level definitions, rather than prescribing specific modelling tools or methodologies. Burdensome mapping requirements would divert resources from critical functions such as network operations and management, while failing to reflect the technical realities of wireless networks.

Report by FarrPoint – Format

Q2. Which technologies should be covered by the new mobile reporting standard (2G, 3G, 4G, and 5G)?

7. If the Commission proceeds with a new mobile reporting standard it should be limited to 4G and 5G technologies, as these represent the latest and most widely used mobile wireless technology. Canadian mobile wireless network operators have largely retired their 2G networks and are in the process of, if not yet completed, phasing out 3G as part of the transition to more spectrum-efficient 4G LTE and 5G technologies.[2] Given their ongoing phase-out and limited remaining footprint, it would not be an efficient use of industry or regulatory resources to develop or maintain detailed reporting requirements for legacy 2G and 3G technologies.

[2] For more information visit: https://canadatelecoms.ca/consumer_resource/faq-3g-hspa-network-discontinuation-in-canada/.

Q3. Which level of detail should the new mobile reporting standard require (e.g., resolution of no less than 50 metres)?

8. We defer to our members' responses.

Q4. Which geographic indexing system should be used (e.g., the H3 hexagonal indexing system)?

9. We defer to our members' responses.

Q5. Which geographic information systems (GIS) software formats should be acceptable (e.g., ArcGIS, QGIS)?

10. We defer to our members' responses.

Modelling and thresholds (recommendations 5 to 7)

Q6. Is it appropriate to label the lowest standard "Emergency"? What are the possible implications of this label?

11. It would be inappropriate to label the lowest coverage standard as "Emergency." The term carries clear public safety implications and would reasonably be understood to mean that service in those areas will always provide dependable emergency communications. A minimum coverage threshold does not and cannot guarantee that level of reliability. Applying the label "Emergency" would therefore create a significant risk of misunderstanding and unrealistic expectations among consumers and public authorities.

12. Areas that meet the lowest modelled standard may still experience limitations due to terrain, building penetration, device capability, or other real-world factors. For example, while an area may technically have network coverage, a customer entering an underground parking garage may lose signal due to interference caused by the building's structural materials. Describing such areas as "Emergency" coverage could foster a false sense of assurance, with potential public safety consequences and reputational risk if service does not perform as assumed in critical situations. Eliminating "emergency" as the entry-level service was also expressly endorsed by FarrPoint in its report, reinforcing that this approach is supported by independent expert analysis.[3]

[3] FarrPoint, *Recommendations on a new reporting standard for mobile coverage*, April 2025; at s 1.4, Recommendation 5.

13. A more neutral term such as “Basic” would be more appropriate for the lowest tier. It would clearly indicate a threshold level of service without overstating its capabilities or implying a guarantee of performance characteristics in all circumstances.

Q7. How prescriptive should the Commission be about TSPs’ mobile coverage predictions?

14. The Commission should avoid being overly prescriptive with respect to the specific methodologies used by wireless service providers (“WSPs”) to generate mobile coverage predictions if new standards are to be imposed. Wireless coverage modelling is inherently complex and involves numerous variables, including terrain data, propagation models, spectrum bands, network configuration, and local topography.

15. WSPs are best positioned to determine the appropriate modelling tools and assumptions for their own networks, and they already employ well-established engineering practices and commercially validated modelling techniques that are widely used in advanced wireless networks. While methodologies may not be identical across providers, they are generally grounded in recognized propagation principles, even if certain inputs or features differ. Additionally, leveraging current systems and processes would reduce the additional cost burden arising from the introduction of a new reporting standard.

Q8. What type of support might small operators need in making their mobile coverage data submissions?

16. We defer to our members’ responses.

Frequency (recommendation 8)

Q9. What would be the implications of moving from 12-month intervals to 6-month intervals for the collection of mobile coverage data?

17. The CTA strongly supports retaining the 12-month reporting cycle. Network deployment and expansion occur over multi-year investment and construction timelines and underlying coverage data does not change fast enough to justify reporting twice annually. Moving to a 6-month cycle would require providers to devote additional resources to reporting rather than to network deployment and improvement. Annual reporting already gives the Commission current, actionable information while preserving focus on continued infrastructure investment. It aligns with the federal

government's priority of reducing red tape and reducing costs for businesses,[4] in addition to the Commission's statutory objectives; facilitating development of a telecommunications system that strengthens Canada's social and economic fabric; ensuring reliable, high-quality, and affordable services are accessible to Canadians in all regions; enhancing the national and international efficiency and competitiveness of Canadian telecommunications; promoting reliance on market forces; and supporting Canadian telecommunications research, development, and innovation.[5]

Validation (recommendations 9 and 10)

Q10. How should the Commission validate mobile coverage submissions?

18. Validation should rely on technically sound and standardized approaches, such as professional drive testing, rather than consumer-facing mobile applications. Proper validation requires specialized software, calibrated equipment, and controlled testing methodologies to ensure reliable and comparable results. Consumer applications are not sufficient for this purpose, as they can produce inconsistent or skewed data due to user error, device variability, operating system limitations (e.g., Apple or Samsung restrictions), insufficient sample sizes, and differences in user behaviour.

19. Where validation is required, it should be conducted at the discretion of the Commission or ISED, leveraging existing capabilities, such as ISED's current data collection activities tied to licence conditions. Validation processes should not impose additional operational or financial burdens on carriers. A regulator-led approach using appropriate technical tools would provide greater consistency and credibility while avoiding the risks associated with crowdsourced or app-based data collection.

Q11. What role should crowdsourcing of data, consumer challenges to coverage submissions, and performance drive tests play in the validation of mobile coverage submissions?

20. See CTA response to Q10 above.

Q12. Which quality of service metrics should be incorporated into the reporting of mobile coverage?

21. Quality of service ("QoS") metrics should not be incorporated into mobile coverage reporting. Coverage reporting should remain focused on objective, technically defined

[4] Government of Canada, *Red Tape Review*, 23 January 2026, at paras 1-2; see also: Canadian Radio-television and Telecommunications Commission, *Red Tape Reduction Progress Report*, 8 September 2025.
[5] *Telecommunications Act*, SC 1993, c 38; at ss 7(a), (b), (c), (f), (g).

signal strength or power-level thresholds, as QoS measures such as throughput or latency are inherently variable and influenced by factors including network congestion, device capability, spectrum band, and environmental conditions.

22. QoS data reflects only a single point-in-time measurement and can fluctuate significantly. For example, customers may experience no latency issues in an area the majority of the time, but if a measurement is taken during a temporary event (such as a severe storm or brief period of congestion) the results may appear disproportionately poor and not representative of typical performance. Including QoS metrics would therefore make reporting more complex, less comparable across providers, and would blur the distinction between baseline network coverage and user experience, which are not the same.

Publication (recommendation 11)

Q13. At which level of detail should the mobile coverage data be published (e.g., resolution of no less than 50 metres)?

23. We defer to our members' responses.

Other issues

Q14. How should the Commission address low Earth orbit satellite-to-mobile technologies?

24. Given the evolving nature of low Earth orbit ("LEO") satellite-to-mobile technologies and limited information available, it is premature to establish reporting requirements at this time. These services remain in early stages of development and deployment, with performance characteristics, spectrum configurations, device compatibility, and service models still being refined.

25. Unlike terrestrial mobile networks, LEO satellite-to-mobile connectivity involves different propagation dynamics and coverage characteristics may vary significantly depending on satellite constellation density, orbital configuration, spectrum use, and gateway infrastructure. As a result, traditional terrestrial coverage modelling approaches may not be directly transferable or appropriate.

26. The Commission should instead monitor technological and commercial developments of LEO satellite-to-mobile. Once these services are matured, the Commission can then assess whether tailored, technology-appropriate reporting frameworks are warranted. Any future approach should recognize the distinct technical characteristics of satellite-based services rather than attempting to apply terrestrial coverage standards by default.

Q15. How could the proposed emergency service standards enhance the National Public Alerting System and ensure reliable communication during emergencies?

27. We have no comment at this time but reserve the right to respond to other interventions during the reply phase of this proceeding.

Q16. How could the service standards ensure that mobile services are accessible and inclusive, particularly for underserved and rural communities?

28. Improving accessibility and inclusivity in underserved and rural communities ultimately depends on sustained investment in network infrastructure. WSPs already understand where coverage gaps exist in their own networks, and coverage challenges in rural areas are typically driven by cost, geography, and infrastructure constraints rather than a lack of awareness. Onerous mapping requirements would divert resources from critical functions such as network operations and management, without addressing the underlying challenges that shape coverage realities in wireless networks.

29. The Commission should also recognize that mobile coverage maps cannot reflect all real-world service limitations. Individual experience varies significantly based on factors such as terrain, building materials, indoor environments, and device type. As such, published coverage maps should be clearly framed as predictive tools rather than service guarantees, with appropriate expectations set for consumers.

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