

**TELECOM NOTICE OF CONSULTATION CRTC 2026-9,
*CALL FOR COMMENTS – MOBILE REPORTING STANDARD***

**REPLY

OF

CANADIAN TELECOMMUNICATIONS ASSOCIATION**

15 APRIL 2026

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1. Executive Summary and Introduction

1. The record of Telecom Notice of Consultation CRTC 2026-9 (“TNC 2026-9”) does not establish a sufficient evidentiary basis to justify regulatory intervention in mobile coverage reporting or mapping. Existing methodologies, including those used in the Annual Facilities Survey (the “Survey”), are widely relied upon, technically sound, and effective in identifying coverage gaps. The introduction of a mobile reporting standard would increase regulatory burden without materially improving accuracy, comparability, or consumer understanding.
2. New mobile reporting standards would undermine the objective of minimizing regulatory burden and would be inconsistent with subsection 7(f) of the *Telecommunications Act*¹ to ensure efficient and effective regulation, as well as the requirement that regulatory measures be proportionate to their purpose as set out in the *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy* (“2023 Policy Order”).²
3. If the Commission nonetheless proceeds to introduce a mobile reporting standard, any new standard should be grounded in objective, technically reliable metrics, such as received signal strength, should be limited to modern technologies (4G and 5G), exclude quality of service (“QoS”) metrics, not be prescriptive as to methodology, and avoid misleading terminology such as “emergency” to describe service levels. Any validation of mobile maps should be government-led and funded, and based on targeted technical testing, rather than crowdsourced data. Above all, regulatory efforts should prioritize encouraging continued investment in network infrastructure, which remains the primary driver of improved connectivity, particularly in rural and underserved areas.
4. The absence of a reply to other intervenors’ submissions should not be construed as agreement with, or acceptance of, their position. To the extent that any comments in this submission conflict with a comment of a Canadian Telecommunications Association (the “Association”) member, the comment of the member shall prevail with respect to that member.

¹ *Telecommunications Act*, SC 1993, c 38 at s 7(f) [*Telecommunications Act*]:

7 It is hereby affirmed that telecommunications performs an essential role in the maintenance of Canada’s identity and sovereignty and that the Canadian telecommunications policy has as its objectives...

...(f) to foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation, where required, is efficient and effective;...

² *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy* (SOR/2023-23), <https://laws.justice.gc.ca/eng/regulations/SOR-2023-23/> at section 4 [2023 Policy Order]:

4 The Commission should ensure that the measures that it imposes through its decisions are efficient and proportionate to their purpose.

2. Insufficient Basis for New Mobile Coverage Standards

5. TNC 2026-9 does not identify any concrete deficiencies in current data or methodologies. As several intervenors point out, the proceeding is largely driven by subjective public opinion research regarding perceived coverage gaps and generalized assertions regarding non-standardized mapping without demonstrating that existing approaches are inaccurate or insufficient.³ It also fails to acknowledge that reported “inaccuracies” in coverage maps often reflect differences in user experience rather than flaws in the underlying mapping. Perceived coverage can vary significantly depending on factors such as building materials, indoor environments, terrain, user density, and device performance—elements no reporting standard can fully capture.⁴
6. To the extent that user experience is relevant, Quebecor observes that the Commission’s own 2025 Market Report indicates fewer than 9% of Canadians report lacking access to a reliable network,⁵ which contradicts the premise of a widespread systemic problem.
7. Before introducing new modelling requirements, any concerns with existing mobile maps should first be more rigorously examined with clearly identified issues, in collaboration with telecommunications service providers (“TSPs”).

3. Received Signal Power as the Preferred Mobile Coverage Metric

8. In our view, a new mobile reporting standard is neither necessary nor warranted. However, if the Commission determines otherwise, it should use received signal power as the preferred metric for modelling mobile coverage. In response to intervenors’ proposals to base modelling on throughput, we submit that a throughput-based mapping standard would not be technically robust or practically implementable as a primary coverage metric.⁶ As the Communications Research Centre report (“CRC Report”) notes, while data throughput can provide a closer proxy for user experience, it is “more difficult to measure in practice or to simulate.”⁷ Data throughput is highly sensitive to factors that are dynamic and location-specific, including network loading, device characteristics, spectrum configuration, and time-of-day conditions.⁸

³ Bell Intervention at para 2; Quebecor Intervention at paras 5-6; SaskTel Intervention at para 4.

⁴ Quebecor Intervention at para 12; Tbaytel Intervention at para 3.

⁵ Quebecor Intervention at para 3.

⁶ CIRA Intervention at page 2, para 3; Northwest Territories Government Intervention at para 8; Technology and Innovation Alberta Intervention at A12.

⁷ Khaledul Islam and Liang Zhang, *Communications Research Centre (CRC) Technical Report: Mobile Coverage Metrics*, 14 June 2024, <https://crtc.gc.ca/eng/publications/reports/mobile2025.htm> at page 6, para 4 [CRC Report].

⁸ Rogers Intervention at para 35.

9. By contrast, received signal power metrics can be consistently modelled using well-established propagation techniques and are therefore more suitable for generating comparable, nationwide coverage maps. It is also notable that the CRC Report indicates that most jurisdictions—including the United Kingdom, Ireland, and countries across the European Union—rely on received signal power as the primary standard for coverage reporting.⁹ This approach is also reflected in brand new regulations in Australia, which base the mobile coverage metrics on radio frequency modelling of signal strength and define coverage levels using RSRP/SS-RSRP thresholds.¹⁰
10. Adopting data throughput as a core mapping metric would introduce significant variability, reduce comparability across TSPs, and risk producing results that cannot be reliably repeated or verified. A more technically sound approach, consistent with the CRC Report’s findings and endorsed by multiple intervenors, is to base coverage maps on standardized signal-strength modelling, which ensures consistency, transparency, and replicability across the industry.¹¹

3.1 Indoor Coverage Modelling Is Not Feasible

11. A few intervenors advocate for separate indoor and outdoor thresholds, arguing that a large proportion of northern residents’ mobile usage occurs indoors, making an “outdoor-only” standard unreasonable.¹² A requirement to model indoor coverage as part of a national mobile mapping standard would not be technically robust or practically implementable, and would undermine the very objectives of consistency, comparability, and transparency that any proposed mobile reporting standard is intended to achieve.
12. Unlike outdoor radio propagation, which can be modelled using well-established and standardized techniques, indoor signal conditions are highly dependent on factors that are inherently variable, localized, and often unknowable at scale. These include building materials (e.g., concrete, steel, energy-efficient glass), construction methods, building geometry, floor level, and even the user’s position within a structure. There is no single set of assumptions that can accurately apply to all building types across Canada that could produce consistent information required to underpin any uniform standards.

⁹ CRC Report at pages 9-16.

¹⁰ Australian Communications and Media Authority, *Telecommunications (Mobile Network Coverage Maps) Industry Standard 2026*, 26 March 2026 at s 5 [Australian Coverage Maps Standard]:

predictive coverage modelling assumptions means: (a) the signal-strength coverage thresholds for 4G and 5G outdoor mobile phone coverage specified in Table 1 in Part 1 of Schedule 1...

¹¹ Build Nova Scotia Intervention at page 2 at para 1; PEI Government Intervention at page 2, para 1.

¹² AFN Intervention at para 12; Northwest Territories Government Intervention at paras 16-20.

3.2 Considerations Outside Scope of Consultation

13. If new standards are to be implemented, it is important to ensure that any associated metrics remain appropriately aligned with the scope and objectives of this proceeding. Some intervenors have proposed metrics that fall outside the scope of the present proceeding, which is focused on mobile wireless. For example, a few intervenors have suggested that the Commission align “advanced” service levels with specific data rate criteria—such as the CRTC’s 50/10 Mbps Universal Service Objective.¹³
14. It would not be appropriate to apply the same 50/10 Mbps objective used for fixed broadband to mobile wireless coverage mapping. The Commission’s 50/10 Mbps benchmark is designed for fixed networks, where a dedicated connection supports sustained, data-intensive uses such as streaming, remote work, and large file transfers. By contrast, mobile wireless networks are designed to support a broader range of use cases, including ubiquitous voice connectivity, messaging, and moderate data usage on the move. These services do not require sustained throughput at fixed broadband levels and are delivered over shared spectrum where performance varies dynamically based on factors such as user density, mobility, signal conditions, and network load.
15. As a result, mobile coverage mapping is appropriately based on signal strength and the ability to support defined service tiers, rather than fixed throughput targets. Applying a 50/10 Mbps standard to mobile would be incompatible with how the service is used, risk mischaracterizing effective mobile coverage as inadequate, and could lead to misleading conclusions for consumers and policymakers.

4. Coverage Standards Should Be Limited to 4G and 5G Technologies

16. While we do not consider the introduction of a new mobile reporting standard to be necessary, should the Commission nevertheless proceed, any new reporting standard should be limited to 4G and 5G, which reflect the current and future state of mobile services in Canada. As 2G and 3G are being phased out,¹⁴ continued reporting on these legacy technologies would create unnecessary burden without providing meaningful insight. A requirement to report on these legacy technologies would be inconsistent with the aforementioned subsection 7(f) of the *Telecommunications Act*¹⁵ and the 2023 Policy Order.¹⁶
17. This approach is supported by the clear consensus among major TSPs, including Bell, Rogers, TELUS, Eastlink, and Quebecor, all of whom emphasize that reporting should focus on the

¹³ AFN Intervention at para 13; Technology and Innovation Alberta Intervention at A2.

¹⁴ For timing of network retirement see: https://canadatelecoms.ca/consumer_resource/faq-3g-hspa-network-discontinuation-in-canada/.

¹⁵ *Telecommunications Act* at s 7(f).

¹⁶ 2023 Policy Order at s 4.

technologies that Canadians rely on today and will rely on going forward.¹⁷ It is also consistent with international practice, such as Australia and the United Kingdom, where mobile maps are focused on reporting on LTE and 5G as legacy networks are retired.¹⁸

18. Focusing on 4G and 5G does not obscure connectivity as suggested by some intervenors,¹⁹ but ensures reporting reflects meaningful, modern service. Including legacy 2G/3G risks creating a false impression of ongoing service availability, at a time when these networks are being decommissioned and no longer meet the needs of the typical mobile user. For example, 2G networks have limited relevance for mainstream consumer mobile services and are used primarily for legacy or niche applications, like legacy machine-to-machine or IoT applications, making their inclusion in coverage reporting of little practical value to Canadian consumers. New mobile devices are designed for 4G and 5G networks and no longer rely on 3G for core services, reinforcing that 3G coverage is not a meaningful measure of current consumer connectivity.

5. “Emergency” Is Not an Appropriate Designation for Mobile Coverage Standards

19. A new mobile reporting standard is not needed. However, if one is adopted by the Commission, labelling the lowest standard of service “Emergency” is clearly not appropriate. There is broad consensus among intervenors across TSPs, governments, and consumer advocacy groups alike that this label risks misleading consumers and creating potential harm.²⁰
20. In particular, the term “Emergency” may be interpreted as a guarantee of reliable access to 9-1-1 or other critical services, which coverage maps cannot ensure given the variability of user experience due to terrain, device limitations, and other factors.²¹ As noted by multiple intervenors, this could foster false expectations, create public safety risks, and expose TSPs to potential liability.²² The FarrPoint Report similarly concludes that “emergency” should not be used as the lowest standard.²³ Using “emergency” as a service standard label may also

¹⁷ Bell Intervention at para 22; Eastlink Intervention at para 9; Quebecor Intervention at paras 16-17; Rogers Intervention at para 9; TELUS Intervention at para 21.

¹⁸ See for example – Ofcom (UK) “[Map Your Mobile](#)” which is limited to 4G/5G coverage; Australian Coverage Maps Standard at s 5.

¹⁹ PIAC Intervention at paras 24-25; PEI Government Intervention at page 2, para 4; Rural Municipalities of Alberta Intervention at page 3, para 3.

²⁰ Bell Intervention at para 32; Build Nova Scotia Intervention at page 3, para 2; Cogeco Intervention at pages 6-7; Eastlink Intervention at para 16; PIAC Intervention at para 32; Rogers Intervention at para 20; TELUS Intervention at para 30; and Tbaytel Intervention at para 6.

²¹ Bell Intervention at para 33; Rogers Intervention at para 21; Tbaytel Intervention at para 18.

²² Bell Intervention at para 6; Eastlink Intervention at para 16.

²³ FarrPoint, *Recommendations on a new reporting standard for mobile coverage*, April 2025, <https://crtc.gc.ca/eng/publications/reports/farrpoint2025.htm>, page 30 at Recommendation 5 [FarrPoint Report].

conflate coverage reporting with distinct public safety systems, such as 9-1-1 connectivity and public alerting frameworks, like the National Public Alerting System.

21. While some intervenors support retaining the label to signal minimal life-safety connectivity, even these submissions acknowledge the risk of confusion with established emergency service frameworks.²⁴ There is little doubt that the risks of misunderstanding and harm outweigh any perceived clarity benefits to consumers. As stated in the Association's initial intervention, a neutral term (e.g., "Basic" or "Minimal") would better reflect the limited nature of the service without implying guaranteed emergency functionality.

6. Mobile Coverage Prediction Methodologies Should be Flexible

22. If the Commission proceeds with implementing new mobile coverage standards without clear evidence of their necessity, it should adopt a flexible, outcomes-based approach and avoid being overly prescriptive in how TSPs develop coverage predictions. There is broad agreement among TSPs, with support from other intervenors, that while consistency in reported outputs is important, prescribing specific modelling methodologies or tools would be inappropriate and counterproductive.²⁵
23. TSPs are best positioned to develop accurate predictions given their detailed knowledge of their own networks. As Rogers notes, imposing uniform modelling assumptions would constrain operators' ability to reflect the technical realities of their systems,²⁶ while Cogeco and Bell similarly emphasize the importance of retaining proprietary, optimized modelling approaches.²⁷ Tbaytel emphasizes that the Commission should focus on setting standardized outputs—such as consistent metrics, thresholds, and formats—rather than prescribing or overseeing carriers' internal processes.²⁸ Technology and Innovation Alberta has reinforced this as well stating: "The Commission should be prescriptive about outputs... However, it should remain non-prescriptive about the prediction software used."²⁹ This position is also reflected in the Province of British Columbia's intervention and is further supported by the FarrPoint Report.³⁰
24. An overly prescriptive approach would risk increasing costs, limiting innovation, and reducing accuracy by forcing operators into rigid frameworks that may not align with their network configurations. Accordingly, the Commission should focus on ensuring transparency and

²⁴ CIRA Intervention at para 2; Technology and Innovation Alberta Intervention at A6.

²⁵ Eastlink Intervention at para 17; Tbaytel Intervention at paras 21-23.

²⁶ Rogers Intervention at para 25.

²⁷ Bell Intervention at para 36; Cogeco Intervention at page 7, para 7.

²⁸ Tbaytel Intervention at para 23.

²⁹ Technology and Innovation Alberta Intervention at A7.

³⁰ BC Government Intervention at para 18; FarrPoint Report at Recommendation 7.

comparability in outputs, while allowing flexibility in the methodologies used to produce them.

7. Reporting Intervals Should Remain at 12 Months

25. The Association strongly opposes shortening the reporting interval to 6 months from 12 months and supports maintaining the current 12-month cycle. National TSPs such as Bell, Rogers, and TELUS highlight that generating national coverage predictions is a complex, resource-intensive process requiring weeks of engineering and validation.³¹ The FarrPoint Report noted that preparing a single submission for the Survey can take up to two months—meaning a semi-annual requirement would create a near-continuous administrative burden.³²
26. Although PIAC points to the United States’ Federal Communications Commission’s 6-month standard,³³ international benchmarks are not necessarily appropriate for Canada, given its vast geography and lower population density. More frequent reporting would increase regulatory burden without delivering meaningful improvements in data quality.³⁴ In many rural and northern areas, where network deployment is constrained by seasonal construction, updates within a 6-month window would show little to no change.³⁵ As Cogeco notes, each submission already requires significant staff time and external resources; doubling the frequency would simply divert effort away from network investment and operations.³⁶
27. Effective regulation must both safeguard the health, safety, and security of Canadians and support a competitive, productive economy. Regulatory inefficiencies—such as complex or outdated procedures, redundant or overly burdensome requirements, and inconsistent or inefficient administration—are increasingly being viewed as obstacles to investment and economic growth.³⁷ Contemplating additional reporting without a proven corresponding benefit is directly in opposition to the Commission’s own public commitments to ensuring efficient and proportionate regulation in its Red Tape Reduction Progress Report.³⁸ It is also inconsistent with subsection 7(f) of the *Telecommunications Act*, which calls for efficient and

³¹ Bell Intervention at para 41; Rogers Intervention at para 28; TELUS Intervention at para 20.

³² FarrPoint Report at page 34, para 4.

³³ PIAC Intervention at para 40.

³⁴ Bell Intervention at para 42; Quebecor Intervention at para 42; Rogers Intervention at para 29.

³⁵ Iristel Intervention at para 20; Tbaytel Intervention at paras 27-28.

³⁶ Cogeco Intervention at page 9 at para 2.

³⁷ Government of Canada; *Red Tape Review*, at

<<https://www.canada.ca/en/government/system/laws/developing-improving-federal-regulations/red-tape-reduction-office/red-tape-review.html>>.

³⁸ Quebecor Intervention at para 15; CRTC, *Red Tape Reduction Progress Report* <<https://crtc.gc.ca/eng/publications/reports/reduction25.htm>>.

effective regulation,³⁹ and with the 2023 Policy Order, which requires that regulatory measures be proportionate to their purpose.⁴⁰

8. Regulator-Led Validation, Not Crowdsourcing

28. While we do not consider the introduction of a new mobile reporting standard to be necessary, any verification work should be government funded, rather than placing additional financial burdens on TSPs. Requiring industry to fund verification testing is neither necessary nor appropriate, given that TSPs already make significant financial contributions—billions in annual payments ranging from spectrum licence fees, regulatory charges, Broadband Fund contributions, and taxes—which go toward funding government initiatives. Imposing further open-ended costs would increase the cost of doing business and risk undermining both investment incentives and affordability outcomes for Canadians.
29. To verify coverage reporting, the Commission should adopt a regulator-led technical validation framework based on professional drive testing. The framework should be based on a sample or audit basis to validate modelled coverage, rather than requiring comprehensive, nationwide verification of all reported coverage. As Bell and Tbaytel note, empirical measurement is the only statistically reliable method for assessing real-world conditions, free from the device and application biases inherent in consumer tools.⁴¹
30. By contrast, crowdsourced data and consumer applications are not suitable for regulatory validation. TELUS highlights that meaningful interpretation requires network-specific context unavailable to third parties,⁴² and Cogeco further notes that many public apps conflate native and roaming networks, rendering the data unreliable for carrier-specific assessments.⁴³ This is further reinforced by New Brunswick’s experience, where a Department of Health pilot using crowdsourced measurement tools to measure rural cell service, produced inconsistent results even under controlled conditions, ultimately leading to the discontinuation of the trial.⁴⁴

9. Exclusion of QoS from Coverage Reporting

31. The intent of question 12 of TNC 2026-9, which asks, "Which quality of service metrics should be incorporated into the reporting of mobile coverage?" is uncertain and introduces ambiguity by potentially conflating two distinct objectives: mapping network availability and measuring end-user experience. Coverage mapping is intended to reflect where service is

³⁹ *Telecommunications Act* at s 7(f).

⁴⁰ 2023 Policy Order at s 4.

⁴¹ Bell Intervention at paras 44-45; Tbaytel Intervention at paras 31-34.

⁴² TELUS Intervention at paras 44-45.

⁴³ Cogeco Intervention at page 10 para 6.

⁴⁴ NB Government Intervention at para 4.

available, whereas QoS metrics capture dynamic, point-in-time performance. The confusion as to which of these two concepts the Commission is asking about in question 12 is evident by the range of responses this question generated.⁴⁵

32. To the extent this question contemplates reporting QoS metrics derived from validation activities, the Association maintains this would be inappropriate, as such data reflects only point-in-time conditions and is not indicative of overall coverage. Accordingly, validation efforts should be limited to confirming whether signal thresholds are accurately represented. While drive testing can capture QoS data, these metrics should not form part of the reporting framework, as they are not foundational to coverage definitions and are driven by transient, non-geographic factors. The Commission should therefore align with established technical guidance and industry consensus by excluding QoS metrics from formal reporting requirements.
33. If, on the other hand, the Commission is asking about the inclusion of QoS metrics in the reporting of coverage by operators, it should be obvious that QoS metrics are not practical to model or represent accurately. As Bell and Rogers note, performance-based measures fluctuate significantly over time and geography, reflecting dynamic interactions between users and network resources.⁴⁶ Incorporating such metrics into a standardized framework would introduce uncertainty and risk producing misleading representations of service availability. Consistent with this, both the CRC and the FarrPoint Reports recommend relying on signal power thresholds, highlighting that QoS metrics are difficult to generate, validate, and interpret in a regulatory context. Moreover, integrating QoS metrics into mapping methodologies would require continuous, large-scale data collection and reporting processes that are complex, expensive, and difficult to scale.
34. While a new reporting standard is not necessary, if the Commission determines otherwise, QoS metrics should not be incorporated into mobile coverage reporting or mapping.⁴⁷ Coverage standards should remain grounded in objective, technically defined signal strength or power-level thresholds, as QoS indicators—such as throughput, latency, or jitter—are inherently variable and influenced by factors including network congestion, device capability, spectrum band, and environmental conditions.

10. Accessibility Improves with Investment, Not Reporting

35. Accessibility and inclusion are enhanced through sustainable investment in network infrastructure, not through a new map reporting standard. As Bell and Quebecor note, coverage gaps in underserved areas are driven primarily by economic constraints, difficult

⁴⁵ NB Government Intervention at para Q10; Technology and Innovation Alberta Intervention at A12.

⁴⁶ Bell Intervention at para 47; Rogers Intervention at paras 37-38.

⁴⁷ Eastlink Intervention at paras 26-30; Quebecor Intervention at paras 55-58; TELUS Intervention at paras 48-49; Tbaytel Intervention at paras 43-46.

terrain, and high deployment costs—not by deficiencies in reporting.⁴⁸ Where the business case for private investment is limited, meaningful progress on inclusivity requires targeted public funding and connectivity programs, rather than reallocating resources toward increasingly burdensome mapping requirements.

36. At the same time, overly complex and granular reporting obligations risk diverting critical resources away from network deployment and maintenance. Tbaytel stresses that reducing regulatory burden is key to improving rural connectivity, as compliance costs directly compete with capital needed to upgrade infrastructure and expand services in remote and Indigenous communities.⁴⁹ Cogeco similarly submits that the Commission’s efforts should focus on supporting infrastructure build-out, rather than implementing reporting regimes that do not directly enhance connectivity.⁵⁰
37. To be effective, the regulatory framework must remain practical, proportionate, and grounded in operational realities. The Commission should prioritize enabling investment and removing barriers to deployment, recognizing that only tangible infrastructure expansion can deliver reliable, high-quality service to underserved communities.

11. Conclusion

38. In summary, the record of TNC 2026-9 does not establish a clear need for regulatory intervention with respect to mobile coverage reporting. Existing methodologies are technically sound, and there is no actual evidence in the record of this proceeding demonstrating that current approaches are deficient or materially inaccurate.
39. The proposals under consideration risk introducing unnecessary complexity, increasing regulatory burden, and diverting resources away from network deployment and maintenance—the very activities that most directly improve connectivity for Canadians. Prescriptive modelling requirements, expanded reporting obligations, and the inclusion of inappropriate metrics such as QoS or public opinion would undermine the objectives of consistency, accuracy, and transparency that the Commission seeks to achieve.
40. If the Commission proceeds to implement any new regulations on mobile coverage, it should adopt a measured and proportionate approach: one that is grounded in signal strength-based metrics, limited to modern technologies, flexible in methodology, and supported by regulator-led and funded validation. Improving connectivity—particularly in rural, remote, and underserved communities—depends not on more granular reporting, but on sustained investment in infrastructure.

⁴⁸ Bell Intervention at para 53; Quebecor Intervention at para 71.

⁴⁹ Tbaytel Intervention at para 52.

⁵⁰ Cogeco Intervention at page 13, para 5.

41. For these reasons, we respectfully submit that the Commission should reconsider the need for new mobile coverage reporting standards or, at minimum, ensure that any measures adopted are evidence-based, proportionate, and aligned with Canada's broader telecommunications policy objectives.

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